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August 4, 2023

Hon. Steve Clark, Minister of Municipal Affairs and Housing
College Park, 17th Flr.
777 Bay St.
Toronto, ON, M7A 2J3

Dear Minister Clark:

RE: City of Kitchener Comments – Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument (ERO Posting 019-6813)

I am writing to you today to share some perspectives from the City of Kitchener's (the City) review of the following ERO posting:

- Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument (ERO Posting 019-6813)

In 2022, the Province initiated a review of the Provincial Policy Statement, 2020 (PPS 2020) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 (A Place to Grow) with the intent of integrating PPS 2020 and A Place to Grow into a new province-wide planning policy instrument. Input and recommendations were sought through ERO Posting 019-6177. The City had provided [comments to the Province in response to the questions asked in ERO Posting 019-6177 as well ERO Posting 019-6161](#) (Conserving Ontario's Natural Heritage). The City appreciates further opportunity to review and provide comments on the proposed Provincial Planning Statement (proposed PPS).

Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument (ERO Posting 019-6813)

Attachment A to this letter includes a detailed review of the proposed PPS, including comments and questions of clarification where needed. Below is a summary of the detailed review provided in Attachment A.

Complete Communities and focus on Housing

The proposed PPS suggests a significantly stronger emphasis on housing. While housing is critically important to Ontarians, it is one component of a complete community. Local municipalities are well positioned to quickly respond to changing needs. Kitchener has streamlined development review processes and has prioritized housing approvals to respond to the housing crisis. It is recommending that provincial legislation continue to maintain a long-term lens, balancing the full range of components that form a complete community. A focus predominantly on housing may have unintended consequences, making it difficult to achieve the benefits of a complete community.

The following policy changes that are intended to increase housing supply appear contrary to the objective and may make it challenging to advance complete communities:

- Reduced emphasis on establishing intensification and density targets
- Potential to expand settlement areas and remove lands from employment areas at any time
- Greater ease of development and lot creation for residential use on rural lands and prime agricultural areas, outside of settlement areas
- Ease of locating sensitive land uses in proximity to major facilities
- Elimination of affordable housing concept and definition.

Kitchener supports efforts to increase housing supply but has concerns with the above noted changes. Creation of more housing should be focused within settlement areas which can quickly accommodate additional housing growth and settlement area expansions should continue to be assessed through municipally led comprehensive reviews to ensure that there is careful consideration of access to services and jobs, natural environment, agricultural systems, cultural heritage, infrastructure and transit delivery, and economic prosperity of the community.

Growth Management

The proposed PPS makes several changes to how growth management concepts and principles have operated since the introduction of the Growth Plan for the Greater Golden Horseshoe in 2006. A provincially coordinated approach to planning for growth is not maintained and municipalities would be enabled to individually manage growth. The following changes in the proposed PPS may also present challenges to a provincially coordinated plan for growth across municipalities with common interests or shared natural features (e.g. ground water aquifers) and infrastructure/services:

- Municipalities to be responsible for their growth forecasts and land needs assessment and to ensure that there are sufficient lands available to meet projected needs for a **minimum** of 25 years
- Less emphasis on accommodating growth and development through intensification within existing settlement areas including the elimination of the concepts of built-up areas and designated greenfield areas and accompanying intensification and density targets, and greater ease of development and lot creation for residential use on rural lands and prime agricultural areas
- No minimum density targets except for major transit station areas and new or expanded settlement areas
- No need for municipal comprehensive reviews to consider expansion of settlement areas and removal of lands from employment areas

Kitchener sees merit in a continued coordinated approach to managing growth in geographic areas with shared interests and infrastructure, like wastewater and water treatment, watershed and natural heritage systems, and transit. The Region of Waterloo is one such area. Kitchener is a leader in growth management. Kitchener first managed growth and related infrastructure through its Staging of Development in the 1960s. This was followed by its first Growth Management Strategy in 2009 to align with the Province's first Growth Plan. While we continue to welcome the opportunity to have a role in managing our growth, we encourage the Province to continue to place value and emphasis on managed, coordinated growth across the Province.

Employment Areas and Lands for Employment

The Province has proposed to change how employment areas are defined by narrowing the list of uses in an employment area and explicitly removing commercial and institutional uses. Further, employment lands that are not in an employment area will be required to allow residential uses.

Kitchener appreciates an updated definition that clarifies what constitutes employment areas. Clarification is needed to understand how ‘lands for employment’ are defined and if municipalities would need to adopt new policies in their official plans that would specifically authorize the continued use of the lawfully established existing use within employment areas. It may be beneficial to closely monitor the impacts of the policy changes on employment areas, and appropriately update the policies.

Sewage and Water Services

The proposed PPS streamlines policies around sewage and water services but have the potential to impact the way municipalities plan for and deliver sewage and water services. Additionally, the proposed PPS suggests that municipalities could offset infrastructure costs needed to support new communities through tools such as credit service refund agreements.

Kitchener appreciates the effort to condense policies and maintain the intent of servicing hierarchy for development in municipalities. Kitchener has concerns with private communal systems for development in the City including a potential ownership risk by the municipality. Kitchener is seeking clarification on whether municipalities would be required to enter into agreements to “upfront” the costs of infrastructure for new communities.

Natural Heritage

Kitchener is pleased to see and is supportive of the continuation of natural heritage policies in the proposed PPS. No changes to these policies are proposed. Similarly, no changes are proposed to related definitions, except for several minor, inconsequential ones. We are supportive of maintaining the natural heritage policy framework of the 2020 PPS as it reflects a proven approach to conserving Ontario’s natural heritage and biodiversity, and both the Region of Waterloo’s and Kitchener’s Official Plans are already consistent with these policies.

Kitchener looks forward to collaborating with the Province to implement the policy changes and is committed to delivering the necessary homes to Ontarians over the next decade. We are appreciative of support from the Province on this work, including the Streamline of Development Approval Fund (SDAF) monies which were used to support work to get more homes built. We look forward to working together in developing new tools and programs to ensure that housing for Ontarians across the housing continuum is delivered.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Stevenson', with a long horizontal flourish extending to the right.

Garett Stevenson, MCIP, RPP
Interim Director of Planning

Attachment A - City of Kitchener Comments on Proposed Provincial Planning Statement released on April 6, 2023

This summary includes the City of Kitchener’s comments on the proposed Provincial Planning Statement released on April 6, 2023 through ERO Posting 019-6813.

Proposed Provincial Planning Statement

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| Chapter 1: Introduction | |
| Vision | The vision is proposed to be completely revised from PPS 2020. The primary emphasis has shifted towards increasing housing supply in Ontario. In addition, the focus is also on creation of complete communities with improved access to housing, employment, schools, transportation options, recreation and public spaces, and services that are equitable and sustainable. |
| Chapter 2: Building Homes, Sustaining Strong and Competitive Communities | |
| 2.1 Planning for People and Homes | |
| <p>1. At the time of each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 25 years, informed by provincial guidance. Planning for <i>infrastructure, public service facilities, strategic growth areas</i> and <i>employment areas</i> may extend beyond this time horizon.</p> <p>Where the Minister of Municipal Affairs and Housing has made a zoning order, the resulting development potential shall be in addition to projected needs over the planning horizon established in the official plan. At the time of the municipality’s next official plan update, this additional growth shall be</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.1.2 A Place to Grow – Section 2.2.1</p> <p>What this means Municipalities in Ontario will be required to ensure sufficient land is made available at time of each official plan update to meet the projected needs for a horizon of “at least” 25 years. It is noted that planning for infrastructure and facilities, strategic growth areas, and employment areas may extend beyond the 25 year time horizon. In contrast, PPS Policy 1.1.2 requires municipalities to ensure sufficient land is made available for a horizon of “up to” 25 years.</p> <p>Municipalities in the Greater Golden Horseshoe are required to plan for a time horizon to 2051. Under A Place to Grow, the Province is required to establish a methodology for land needs assessment. The Minister, in 2020, had established a Land Needs Assessment Methodology document to assess the quantity of land required to</p> |

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| <p>incorporated into the official plan and related infrastructure plans.</p> | <p>accommodate the forecasted growth. The Proposed Approach to Implementation of the proposed Provincial Planning Statement document, mentions that municipalities are expected to move towards doing their own forecasting of population and employment growth as it becomes necessary to extend the horizon beyond 2051.</p> <p>Kitchener (and each area municipality in the Region of Waterloo) will be required to continue to meet or exceed the growth allocations by the Region of Waterloo Official Plan for a time horizon to 2051. Subsequent update to land needs and ensuring land is available to accommodate projected needs for a horizon of at least 25 years is anticipated to be included during an Official Plan update.</p> <p>Where a Minister’s Zoning Order has been made, the resulting development will be required to be in addition to the established projected needs and this additional growth must be incorporated in the official plan and related infrastructure plans at the time of next official plan update.</p> <p>Comments There is <i>merit in continuing a coordinated, methodological, allocation-based approach to land needs</i> in the Region that is facilitated by the Province as is currently facilitated by A Place to Grow. Land needs assessment and planning for growth conducted by each area municipality independently has the potential of negatively impacting critical farmland, natural heritage systems, and drinking water resources in the Region. It could further lead to premature and financially unsustainable expansion of municipal services.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • Is any Provincial guidance in terms of a Land Needs Assessment Methodology being considered for consistency amongst Ontario municipalities on how land needs are projected? |
| <p>2. To provide for an appropriate range and mix of <i>housing options</i> and densities required to meet projected requirements of current and future</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.4.1 A Place to Grow – NA</p> |

Proposed Provincial Planning Statement Policy

City of Kitchener Comments and Questions

residents of the *regional market area*, planning authorities shall:
a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are *designated and available* for residential development; and
b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.

What this means

Municipalities are required to maintain the ability to accommodate residential growth for a minimum of 15 years through lands “designated and available” for residential development. This contrasts with PPS 2020 which required to accommodate residential growth through lands “designated and available” **only if it were necessary after “residential intensification and redevelopment”**. Definition of “residential intensification” is proposed to be deleted although “intensification” is still defined and intended to maintain the purpose of residential intensification in subsequent policies. The definition for “designated and available” remains unchanged.

Furthermore, municipalities will also be required to maintain land with servicing capacity sufficient to provide at least a three-year supply of residential units available through “lands suitably zoned, including units in draft approved or registered plans”. This contrasts with PPS 2020 which required to provide land with servicing capacity sufficient for at least a three-year supply of residential units available through “lands suitable zoned to facilitate residential intensification and redevelopment, and land in draft approved or registered plans”.

The focus in the proposed Provincial Planning Statement appears to be shifting away from residential intensification and redevelopment of lands. Although residential intensification and redevelopment does not necessarily seem to be out of consideration, municipalities may choose not to advance intensification and opt to make additional lands available for future development.

Definition of “housing options” is also proposed to be expanded and include a more diverse range of options. However, definition of “affordable” is proposed to be deleted.

Historically, Kitchener (and other area municipalities in the Region of Waterloo) has relied on the Region for population and unit allocations for planning purposes. Land Needs Assessment by the Region provides these allocations for Kitchener up to 2051

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| | <p>which can be used to maintain land as per this policy until the land needs is required to be updated.</p> <p>Comments As stated earlier with respect to proposed policy 2.1.1, there is <i>merit in continuing a coordinated, methodological, allocation-based approach to land needs</i> in the Region that is facilitated by the Province as is currently facilitated by A Place to Grow.</p> <p>Residential intensification is critical in advancing sustainability objectives, reduce greenhouse gas emissions by eliminating/reducing vehicular trips, combating the climate crisis, and achieving many of the matters of provincial interest as prescribed under Section 2 of the <i>Planning Act</i>. The Province should maintain the focus on and encourage residential intensification and redevelopment.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • What would constitute a regional market area for area municipalities in the Region of Waterloo? |
| <p>3. Where planning is conducted by an upper-tier municipality, the land and unit supply maintained by the lower-tier municipality identified in policy 2.1.2 shall be based on and reflect the allocation of population and units by the upper-tier municipality.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.4.2 A Place to Grow – NA</p> <p>What this means PPS 2020 policy 1.4.2 is proposed to be carried forward with a minor change that is a result of A Place to Grow being revoked at some time. As the Region of Waterloo is anticipated to have no more planning responsibilities, this policy does not have implications for Kitchener.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |

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| <p>4. Planning authorities should support the achievement of <i>complete communities</i> by:</p> <p>a) accommodating an appropriate range and mix of land uses, <i>housing options</i>, transportation options with <i>multimodal</i> access, employment, <i>public service facilities</i> and other institutional uses (including, schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;</p> <p>b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and</p> <p>c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.1.1 A Place to Grow – Section 2.2.1.4</p> <p>What this means ‘Complete communities’ terminology is a defined term that is proposed to be adopted from A Place to Grow and replace the ‘healthy, livable and safe communities’ terminology. The PPS 2020 Policy 1.1.1 is proposed to be substantially condensed. Key concerning parts of the policy that are proposed to be removed include efficient use of land, long-term financial well-being of municipalities, and transit-supportive development. Further, affordable housing and accompanying definition of affordable is proposed to be deleted. There is an added focus on improving social equity and overall quality of life for all.</p> <p>Comments Planning for and creation of complete communities is an important part in achieving a thriving economy, a clean and healthy environment and social equity. Complete communities should be achieved by transit-supportive development without undermining efficient use of land and long-term financial well-being of municipalities. Province should consider retaining the parts of the policy from PPS 2020 and continue to encourage transit-supportive development, long-term financial well-being of municipalities, and efficient use of land.</p> <p>Questions of clarification None</p> |
| 2.2 Housing | |
| <p>1. Planning authorities shall provide for an appropriate range and mix of <i>housing options</i> and densities to meet projected needs of current and future residents of the <i>regional market area</i> by:</p> <p>a) coordinating land use planning and planning for housing with Service Managers to address the full</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.4.3 A Place to Grow – Section 2.2.6</p> <p>What this means Concept of establishing and maintaining minimum targets for the provision of affordable housing is proposed to be removed and replaced with planning authorities</p> |

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| <p>range of <i>housing options</i> including housing affordability needs;</p> <p>b) permitting and facilitating:</p> <ol style="list-style-type: none"> 1. all <i>housing options</i> required to meet the social, health, economic and well-being requirements of current and future residents, including <i>additional needs housing</i> and needs arising from demographic changes and employment opportunities; and 2. all types of residential <i>intensification</i>, including the conversion of existing commercial and institutional buildings for residential use, development and introduction of new <i>housing options</i> within previously developed areas, and <i>redevelopment</i> which results in a net increase in residential units in accordance with policy 2.3.3; <p>c) promoting densities for new housing which efficiently use land, resources, <i>infrastructure</i> and <i>public service facilities</i>, and support the use of <i>active transportation</i>; and</p> <p>d) requiring <i>transit-supportive</i> development and prioritizing <i>intensification</i>, including potential air rights development, in proximity to transit, including corridors and stations.</p> | <p>being required to coordinate with Service Managers to address the housing affordability needs for the community.</p> <p>Planning authorities will be required to permit and facilitate, all types of residential intensification. This would include the conversion of existing commercial and institutional “buildings” for residential use, development and introduction of new housing options within previously development areas, and redevelopment.</p> <p>Further, “directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs” and “establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety” are proposed to be deleted.</p> <p>Comments</p> <p>The proposed changes suggest limited role of planning authorities in provision of affordable housing and weakening of other measures such inclusionary zoning and development charge exemptions for affordable housing projects put forth recently by the Province. Kitchener is a strong proponent of a supply of housing along the housing continuum, which includes options for affordable housing. In 2020 Kitchener Council approved its award-winning Housing for All Strategy with over 40 action items to advance its commitments to affordable housing in Kitchener. Housing options must include housing that is affordable in relation to economic requirements and income levels of the community, a concept which is proposed to be withdrawn. Kitchener will continue to advocate for and work with all levels of government to ensure everyone has access to housing that is appropriate for their means, safe, and affordable.</p> <p>Residential intensification is a key concept of the PPS 2020 and A Place to Grow that aids in achieving complete communities and long-term sustainability (environmental and economic) goals. Province should consider strengthening policies for residential intensification, including maintaining intensification targets as in case of PPS 2020 and</p> |

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| | <p>A Place to Grow. Further comments in relation to intensification are provided in subsequent policies for settlement areas.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • For coordination with Service Managers in relation to proposed Policy 2.2.1 a), would aligning land use planning and addressing housing needs with applicable housing and homelessness plans be considered? What would entail coordination in such a case for planning authorities? Do Service Managers also have equivalent obligation? • Is the “conversion of existing commercial and institutional buildings” limited to only buildings or is it intended to encompass commercial and institutional land uses more broadly? • Proposed Policy 2.2. b) 2 refers to proposed Policy 2.3.3. Clarification is needed whether this policy would be applicable only for settlement areas. Further, will this require planning authorities to plan and invest in infrastructure and public service facilities as necessary rather than directing development of new housing where appropriate levels of infrastructure and public service facilities are or will be available (policy 1.4.3 c) of PPS 2020 which is proposed to be removed)? |
| 2.3 Settlement Areas and Settlement Area Boundary Expansions | |
| <p>1. <i>Settlement areas</i> shall be the focus of growth and development. Within <i>settlement areas</i>, growth should be focused in, where applicable, <i>strategic growth areas</i>, including <i>major transit station areas</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section</p> <p>PPS 2020 – Policy 1.1.3.1 A Place to Grow – 2.2.1.2 c)</p> <p>What this means</p> <p>Settlement areas will remain the focus of growth and development. The definition of settlement areas is proposed to be modified but largely be similar to the existing definition. Strategic growth areas including MTSAs, where applicable, are noted to be focus of growth within settlement areas. Definition of strategic growth areas is largely adopted from A Place to Grow. However, it is expanded to include “other areas where growth or development will be focused”. The concept of delineated built-up areas in A Place to Grow is not proposed to be carried forward.</p> |

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| | <p>Comments Focusing growth and development to be within strategic growth areas, including major transit station areas, is appropriate to advance complete communities and sustainability objectives.</p> <p>Questions of clarification None</p> |
| <p>2. Land use patterns within <i>settlement areas</i> should be based on densities and a mix of land uses which:</p> <ul style="list-style-type: none"> a) efficiently use land and resources; b) optimize existing and planned <i>infrastructure</i> and <i>public service facilities</i>; c) support <i>active transportation</i>; d) are <i>transit-supportive</i>, as appropriate; and e) are <i>freight-supportive</i>. | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.1.3.2 A Place to Grow – Section 2.2.2</p> <p>What this means The concept of densities is proposed to be encouraged. In contrast, PPS 2020 is more directive and requires land use patterns to be based on densities and mix of land uses. More flexibility is awarded to municipalities in relation to densities and mix of land uses in settlement areas. Reference to impacts to air quality and climate change, energy efficiency, and preparing for impacts of a changing climate are proposed to be deleted. However, the overall intent around energy conservation, air quality and climate change are reflected in proposed policy 2.9.</p> <p>Comments There is merit in providing flexibility to planning authorities. However, a directive approach in this case may be beneficial particularly for large and fast-growing municipalities such as Kitchener.</p> <p>Questions of clarification None</p> |
| <p>3. Planning authorities should support general <i>intensification</i> and <i>redevelopment</i> to support the achievement of <i>complete communities</i>, including by planning for a range and mix of <i>housing options</i> and prioritizing planning and investment in the necessary <i>infrastructure</i> and <i>public service facilities</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.1.3.3, Policy 1.1.3.4, Policy 1.1.3.5, Policy 1.1.3.6, Policy 1.1.3.7 A Place to Grow – Section 2.2.2, Section 2.2.3, Section 2.2.7</p> <p>What this means</p> |

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| | <p>Policies in PPS 2020 in relation to intensification and redevelopment are proposed to be deleted. Further, mandate to establish intensification targets and density targets as well as those prescribed for built-up areas and designated greenfield areas in A Place to Grow are not proposed to be brought forward. The new proposed policy supports intensification and redevelopment in settlement areas but is not specific to residential use.</p> <p>Comments The proposed changes place much less emphasis on growth through intensification – that is growth in already built-up areas. There are many advantages to grow in areas where there is already infrastructure and services to support growth. The Province should consider retaining the emphasis on growth through intensification.</p> <p>Questions of clarification None</p> |
| <p>4. In identifying a new <i>settlement area</i> or allowing a <i>settlement area</i> boundary expansion, planning authorities should consider the following:</p> <p>a) that there is sufficient capacity in existing or planned <i>infrastructure</i> and <i>public service facilities</i>;</p> <p>b) the applicable lands do not comprise <i>specialty crop areas</i>;</p> <p>c) the new or expanded <i>settlement area</i> complies with the <i>minimum distance separation formulae</i>;</p> <p>d) impacts on agricultural lands and operations which are adjacent or close to the <i>settlement area</i> are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an <i>agricultural impact assessment</i> or equivalent analysis, based on provincial guidance; and</p> <p>e) the new or expanded <i>settlement area</i> provides for the phased progression of urban development.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.1.3.8, Policy 1.1.3.9 A Place to Grow – Section 2.2.8.2, Section 2.2.8.3, Section 2.2.8.4, Section 2.2.8.5, Section 2.2.8.6</p> <p>What this means Policies in relation to settlement area boundary expansion/adjustment are proposed to be substantially altered in an attempt to give municipalities more flexibility and encourage housing supply. The changes include:</p> <ul style="list-style-type: none"> • removal of comprehensive reviews from the proposed PPS; • change from the use of directive language “shall” to the use of encouraging language “should” for meeting the criteria listed in this policy; • removal of policy in relation to settlement area boundary adjustments; • removal of demonstration that sufficient opportunities to accommodate projected needs exist through intensification, redevelopment, and designated growth areas; |

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| | <ul style="list-style-type: none"> • removal of demonstration that infrastructure and public service facilities are financially viable over their lifecycle, and protect public health and safety and the natural environment; • introduction of agricultural impact assessment or equivalent analysis to avoid, minimize or mitigate impacts on agricultural lands and operations; and, • addition of policy that considers new or expanded settlement area providing for phased progression of urban development. <p>Comments</p> <p>The proposed changes would enable applications for new or expansions of settlement areas, including those that are not municipally initiated, at any time. The policy tests for new or expansion of settlement areas that are currently required to be demonstrated are proposed to be changed where they are encouraged to be considered by planning authorities. Although this seems to provide some flexibility to planning authorities, this change has the potential to make it difficult to comprehensively consider expansion requests and encourages a “first come first served” approach. The proposed changes, if enacted, have the potential of resulting in increased uncertainty over when and where a municipality could grow, straining municipal financial resources required to expand infrastructure and public service facilities, and prematurely losing critical agricultural land to development.</p> <p>Municipal comprehensive review process has been effective in ensuring a balanced, policy-led approach to assess land needs, accommodate forecasted growth, and avoid unnecessary or premature settlement area expansions. The province should consider revising the proposed policy to enable new or expansion of settlement areas only when it is municipally initiated and meets the policy tests. Policy for settlement area boundary adjustments should be considered to be retained.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • Since municipalities are required to be consistent with policy statements issued under the <i>Planning Act</i>, it is requested that the Province clarify how municipalities can achieve consistency with the proposed PPS where they are encouraged to consider a prescribed criteria. |

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| | <ul style="list-style-type: none"> Without measurable provincial criteria, how will planning authorities justify new or expansion of settlement areas? Are municipalities enabled to establish their own criteria? |
| <p>5. Planning authorities are encouraged to establish density targets for new <i>settlement areas</i> or <i>settlement area</i> expansion lands, as appropriate, based on local conditions. <i>Large and fast-growing municipalities</i> are encouraged to plan for a minimum density target of 50 residents and jobs per gross hectare.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – 2.2.7.2</p> <p>What this means This proposed new policy encourages establishment of density targets for new settlement areas or settlement area expansion lands based on local conditions. This appears to be referencing new designated greenfield areas, a concept which is not proposed to be bought forward from A Place to Grow.</p> <p>Comments Through this proposed policy, municipalities will have some flexibility in relation to establishing density targets. However, this policy has the potential of leading to different approaches to be undertaken by different municipalities.</p> <p>The density target of 50 residents and jobs per gross hectare for large and fast-growing municipalities is encouraged. Province should consider mandating this minimum density target to help achieve its complete communities’ objectives.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> Does this policy to establish density targets only pertain to new settlement areas or expanded portions of existing settlement areas? Would this policy encourage establishing density targets for existing settlement areas? Is the minimum density target of 50 residents and jobs per gross hectare for large and fast-growing municipalities only in relation to new settlement areas or expanded portions of existing settlement areas? |
| 2.4 Strategic Growth Areas | |
| 2.4.1 General Policies for Strategic Growth Areas | |

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| <p>1. To support the achievement of <i>complete communities</i>, a range and mix of <i>housing options</i>, <i>intensification</i> and more mixed-use development, planning authorities may, and <i>large and fast-growing municipalities</i> shall, identify and focus growth and development in <i>strategic growth areas</i> by:</p> <p>a) identifying an appropriate minimum density target for each <i>strategic growth area</i>; and</p> <p>b) identifying the appropriate type and scale of development in <i>strategic growth areas</i> and transition of built form to adjacent areas.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – Section 2.2.2.3</p> <p>What this means This proposed policy adopts the concept of strategic growth areas from A Place to Grow. However, accompanying policies related to density and intensification targets are not proposed to be carried forward and planning authorities will have flexibility in this regard. Further, large and fast-growing municipalities are mandated to identify and focus growth in the strategic growth areas by identifying appropriate minimum density target and the type and scale of development for each strategic growth area.</p> <p>Comments Kitchener (and other large and fast growing municipalities including Waterloo and Cambridge) will be required to identify strategic growth areas which include major transit station areas, urban growth centres, other areas where growth or development will be focused, and lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors. There seems to be flexibility in terms of identifying the minimum density targets for each strategic growth areas as well as identifying the appropriate type and scale of development and transition of built form. Though this flexibility is important to consider local contexts, it may result in inconsistent approaches being taken by different municipalities. The province should consider prescribing minimum targets or provide guidance towards the approach in identifying minimum targets for strategic growth areas.</p> <p>Questions of clarification None</p> |
| <p>2. Any reduction in the size or change in the location of <i>urban growth centres</i> identified in an in effect official plan as of [effective date] may only occur through a new official plan or official plan amendment adopted under section 26 of the <i>Planning Act</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – Section 2.2.3</p> <p>What this means</p> |

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| | <p>This proposed policy brings in the concept of urban growth centres from A Place to Grow but only to the effect of reducing the size or changing the location of urban growth centres that have been identified in an official plan as of date yet to be determined through an official plan amendment. Other accompanying policies in relation to urban growth centres, including minimum density targets, are not proposed to be adopted from A Place to Grow.</p> <p>Comments The ability to reduce or change the location of identified urban growth centres may be beneficial. Kitchener’s urban growth centre continues to grow beyond the minimum density target prescribed by A Place to Grow. However, Kitchener’s urban growth centre boundary overlaps four of its identified major transit station area boundaries which have a lower density target than the urban growth centre currently. In the absence of any provincial policy related to urban growth centres, we question the merit of including a policy that allows for adjustments in boundaries or relocation of urban growth centers.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • Clarification is needed if reduction in the size of urban growth centres could include complete removal of urban growth centres. |
| 2.4.2 Major Transit Station Areas | |
| <p>1. <i>Large and fast-growing municipalities</i> shall delineate the boundaries of <i>major transit station areas</i> on <i>higher order transit corridors</i> through a new official plan or official plan amendment adopted under section 26 of the <i>Planning Act</i>. The delineation shall define an area within a 500 to 800 metre radius of a transit station and that maximizes the number of potential transit users that are within walking distance of the station.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – Section 2.2.4</p> <p>What this means The concept of major transit station areas is proposed to be carried forward from A Place to Grow. This policy largely reflects the definition of major transit station area in A Place to Grow.</p> <p>Comments No comments</p> |

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| | <p>Questions of clarification None</p> |
| <p>2. Within <i>major transit station areas on higher order transit corridors, large and fast-growing municipalities</i> shall plan for a minimum density target of:</p> <p>a) 200 residents and jobs combined per hectare for those that are served by subways; b) 160 residents and jobs combined per hectare for those that are served by light rail or bus rapid transit; or c) 150 residents and jobs combined per hectare for those that are served by commuter or regional inter-city rail.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – Section 2.2.4.3</p> <p>What this means Existing minimum density targets for major transit station areas in A Place to Grow are proposed to be carried forward. Minimum density target of 150 residents and jobs per hectare is proposed for commuter or regional inter-city rail, as opposed to the GO Transit network in A Place to Grow.</p> <p>Comments Kitchener is supportive of a prescribed minimum density target for major transit station areas.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> Request to clarify or define commuter or regional inter-city rail. |
| <p>3. For any particular <i>major transit station area, large and fast-growing municipalities</i> may request the Minister to approve an official plan or official plan amendment with a target that is lower than the applicable target established in policy 2.4.2.2, where it has been demonstrated that this target cannot be achieved because:</p> <p>a) <i>development</i> is prohibited by provincial policy or severely restricted on a significant portion of the lands within the delineated area; or b) there are a limited number of residents and jobs associated with the built form, but a <i>major trip generator</i> or feeder service will sustain high ridership at the station or stop.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – Section 2.2.4.4</p> <p>What this means This policy is proposed to be carried forward from A Place to Grow and enables setting of a lower minimum density target for an identified major transit station area where the prescribed tests are met.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |

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| <p>4. Planning authorities that are not <i>large and fast-growing municipalities</i> may plan for <i>major transit station areas</i> on <i>higher order transit</i> corridors by delineating boundaries and establishing minimum density targets.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – Section 2.2.4</p> <p>What this means This proposed policy is applicable only to municipalities that are not one of the large and fast-growing municipalities as identified by the province and enables them to plan for major transit station areas on higher order transit corridors.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>5. Planning authorities may plan for <i>major transit station areas</i> that are not on <i>higher order transit</i> corridors by delineating boundaries and establishing minimum density targets.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – Section 2.2.4</p> <p>What this means This proposed policy enables planning of major transit station areas that are not on higher order transit corridors and establishing minimum density targets for these.</p> <p>Comments It is not clear where this policy would apply and what areas may be delineated as major transit station areas that are not on higher order transit corridors. It appears that this may enable planning for major transit station areas that around planned higher order transit corridors. However, by definition of major transit station areas, planned higher order transit station or stop is included. There also appears to be some flexibility in establishing minimum density targets for such major transit station areas.</p> <p>Questions of clarification</p> |

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| | <ul style="list-style-type: none"> Request to clarify if this policy enables preemptively delineating major transit station areas along planned higher order transit corridors that are currently not higher order transit corridors. Is there flexibility in establishing minimum density targets if major transit station areas are non on higher order transit corridors? Would policy 2.4.2.2 still be applicable if higher order transit corridor is planned? |
| <p>6. All <i>major transit station areas</i> should be planned and designed to be <i>transit-supportive</i> and to achieve <i>multimodal</i> access to stations and connections to nearby <i>major trip generators</i> by providing, where feasible:</p> <p>a) connections to local and regional transit services to support <i>transit service integration</i>;</p> <p>b) <i>infrastructure</i> that accommodates a range of mobility needs and supports <i>active transportation</i>, including sidewalks, bicycle lanes, and secure bicycle parking; and</p> <p>c) commuter pick-up/drop-off areas.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – Section 2.2.4.8</p> <p>What this means This proposed policy is largely carried forward from A Place to Grow. However, the directive language in A Place to Grow is proposed to be modified to an encouraging language.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| 2.5 Rural Areas in Municipalities | |
| <p>1. Healthy, integrated and viable <i>rural areas</i> should be supported by: a) building upon rural character, and leveraging rural amenities and assets;</p> <p>b) promoting regeneration, including the <i>redevelopment of brownfield sites</i>;</p> <p>c) accommodating an appropriate range and mix of housing in rural <i>settlement areas</i>;</p> <p>d) using rural <i>infrastructure</i> and <i>public service facilities</i> efficiently;</p> <p>e) promoting diversification of the economic base and employment opportunities through goods and</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Section 1.1.4 A Place to Grow – Section 2.2.9</p> <p>What this means This proposed section is largely carried forward from PPS 2020 with some modifications. Policy to encourage the conservation and redevelopment of existing rural housing stock on rural lands is proposed to be deleted. Further, policy 1.1.4.2 of PPS 2020 directing focus of growth and development in rural areas to be in rural settlement areas is proposed to be deleted.</p> <p>Comments</p> |

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| <p>services, including value-added products and the sustainable management or use of resources;</p> <p>f) providing opportunities for sustainable and diversified tourism, including leveraging historical, cultural, and natural assets;</p> <p>g) conserving biodiversity and considering the ecological benefits provided by nature; and</p> <p>h) providing opportunities for economic activities in <i>prime agricultural areas</i>, in accordance with policy 4.3.</p> <p>2. When directing development in rural <i>settlement areas</i> in accordance with policy 2.3, planning authorities shall give consideration to locally appropriate rural characteristics, the scale of development and the provision of appropriate service levels.</p> <p>Growth and development may be directed to <i>rural lands</i> in accordance with policy 2.6, including where a municipality does not have a <i>settlement area</i>.</p> | <p>Although urban settlement areas should be the focus of growth and development in the province, rural settlement areas should be the focus of growth and development in rural areas of the province. This is important to avoid unnecessary conversion of prime agricultural land for development. The province should consider retaining policy 1.1.4.2 of PPS 2020, that would direct growth within rural areas to be within rural settlement areas.</p> <p>Questions of clarification None</p> |
| 2.6 Rural Lands in Municipalities | |
| <p>1. On <i>rural lands</i> located in municipalities, permitted uses are: a) the management or use of resources;</p> <p>b) resource-based recreational uses (including recreational dwellings not intended as permanent residences);</p> <p>c) residential development, including lot creation and multi-lot residential development, where site conditions are suitable for the provision of appropriate <i>sewage and water services</i>;</p> <p>d) <i>agricultural uses, agriculture-related uses, on-farm diversified uses and normal farm practices</i>, in accordance with provincial standards;</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Section 1.1.5 A Place to Grow – Section 2.2.9</p> <p>What this means This proposed section is largely carried forward from PPS 2020 with some modifications. Policy 1.1.5.1, 1.1.5.3 and 1.1.5.6 of PPS 2020 are proposed to be deleted. Proposed policy 2.6.1 c) is expanded to permit residential development that includes multi-lot residential development where site conditions are suitable for appropriate sewage and water services.</p> <p>Comments</p> |

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| <p>e) home occupations and home industries; f) cemeteries; and g) other rural land uses.</p> <p>2. Development that can be sustained by rural service levels should be promoted.</p> <p>3. Development shall be appropriate to the <i>infrastructure</i> which is planned or available, and avoid the need for the uneconomical expansion of this <i>infrastructure</i>.</p> <p>4. Opportunities to support a diversified rural economy should be promoted by protecting agricultural and other resource-related uses and directing non-related development to areas where it will minimize constraints on these uses.</p> <p>5. New land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the <i>minimum distance separation formulae</i>.</p> | <p>The proposed changes to Section 2.5, 2.6, and 4.3 (Agriculture) signal a shift that may limit a municipality’s ability to prevent unplanned growth outside of settlement areas.</p> <p>Questions of clarification None</p> |
| <p>2.7 Territory Without Municipal Organization</p> | <p>Section 1.1.6 of PPS 2020 has been largely carried forward with minor changes proposed. No implications for Kitchener anticipated, therefore no comments.</p> |
| <p>2.8 Employment</p> | |
| <p>2.8.1 Supporting a Modern Economy</p> | |
| <p>1. Planning authorities shall promote economic development and competitiveness by: a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs; b) providing opportunities for a diversified economic base, including maintaining a range and choice of</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.3.1 A Place to Grow – Section 2.2.5.1</p> <p>What this means Minor changes to existing policy 1.3.1 of PPS 2020. Intent of section 2.2.5.1 of A Place to Grow appears to be maintained.</p> |

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| <p>suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;</p> <p>c) identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment; and</p> <p>d) encouraging <i>intensification</i> of employment uses and compact, mixed-use development that incorporates compatible employment uses such as office, retail, industrial, manufacturing and warehousing, to support the achievement <i>complete communities</i>.</p> | <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>2. Industrial, manufacturing and small-scale warehousing uses that could be located adjacent to <i>sensitive land uses</i> without <i>adverse effects</i> are encouraged in <i>strategic growth areas</i> and other mixed-use areas where <i>frequent transit</i> service is available, outside of <i>employment areas</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – NA</p> <p>What this means Proposed policy which enables and encourages industrial, manufacturing and small-scale warehousing uses that are compatible with sensitive land uses to be located in strategic growth areas or mixed use areas where frequent transit service is available.</p> <p>Comments Kitchener is supportive of non-residential uses that are compatible with sensitive land uses to be located in strategic growth areas to advance complete communities.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • Should this be modified to say where frequent transit service is ‘available or planned’ |
| <p>3. On lands for employment outside of <i>employment areas</i>, and taking into account the transition of uses</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA</p> |

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| <p>to prevent <i>adverse effects</i>, a diverse mix of land uses, including residential, employment, <i>public service facilities</i> and other institutional uses shall be permitted to support the achievement of <i>complete communities</i>.</p> <p>4. Official plans and zoning by-laws shall not contain provisions that are more restrictive than policy 2.8.1.3 except for purposes of public health and safety.</p> | <p>A Place to Grow – NA</p> <p>What this means New proposed policies that direct a mix of uses including residential, employment, public service facilities and other institutional uses be permitted on land for employment outside of employment areas. Further, official plans and zoning by-laws are prohibited to have more restrictive provisions except for purposes of public health and safety.</p> <p>Comments It is not clear as to what would constitute lands for employment outside of employment areas. The intent here seems to signal a conversion of employment land uses (commercial, institutional) to mixed uses.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • What are lands for employment outside of employment areas? Would this include retail and office spaces and would this policy require such uses to permit residential uses and essentially become mixed use designations? |
| <p>5. Major office and major institutional development should be directed to <i>major transit station areas</i> or other <i>strategic growth areas</i> where <i>frequent transit service</i> is available.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – Section 2.2.5.2</p> <p>What this means New policy proposed to be adapted from A Place to Grow which ‘encourages’ rather than requiring major office and institutional development to be directed to major transit station areas or other strategic growth areas where frequent transit service is available (as opposed to existing or planned frequent transit service).</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |

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| 2.8.2 Employment Areas | |
| <p>1. Planning authorities shall plan for, protect and preserve <i>employment areas</i>:</p> <p>a) for current and future uses and ensure that the necessary <i>infrastructure</i> is provided to support current and projected needs; and</p> <p>b) that are located in proximity to <i>major goods movement facilities and corridors</i>, including facilities and corridors identified in provincial transportation plans, for the <i>employment area</i> uses that require those locations.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.3.2.1, Policy 1.3.2.6 A Place to Grow – Section 2.2.5.5</p> <p>What this means Policy 1.3.2.1 and 1.3.2.6 of PPS 2020 are proposed to be consolidated.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>2. Planning authorities shall designate, protect and plan for all <i>employment areas</i> in <i>settlement areas</i> by:</p> <p>a) planning for <i>employment area</i> uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;</p> <p>b) prohibiting residential uses, commercial uses, <i>public service facilities</i> and other institutional uses;</p> <p>c) prohibiting retail and office uses that are not associated with the primary employment use;</p> <p>d) prohibiting other <i>sensitive land uses</i> that are not ancillary to the primary employment use; and</p> <p>e) including an appropriate transition to adjacent non-<i>employment areas</i> to ensure land use compatibility.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.3.2.3 A Place to Grow – NA</p> <p>What this means Policy 1.3.2.3 of PPS 2020 is proposed to be modified and expanded to direct planning authorities to designate, protect and plan for employment areas within settlement areas.</p> <p>Comments This policy appears to apply to municipalities which have settlement areas. The criteria for designating, protecting and planning for employment areas in settlement areas is reasonable, considering existing policies in place.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • Will all municipalities be required to designate employment areas where they have settlement areas? |
| <p>3. Planning authorities shall assess and update <i>employment areas</i> identified in official plans to</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.3.2.2</p> |

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| <p>ensure that this designation is appropriate to the planned function of <i>employment areas</i>.</p> | <p>A Place to Grow – Section 2.2.5.6</p> <p>What this means Planning authorities are proposed to be mandated to assess and update employment areas that are identified in the official plans. The reference to ‘at the time of official plan review or update’ is proposed to be removed.</p> <p>Comments Kitchener (in coordination with adjacent area municipalities) will be required to update its employment area boundaries based on the updated definition of employment areas. It is not clear by when municipalities will be required to assess and update their employment areas. Further, changes proposed through Bill 97 to the <i>Planning Act</i> contemplates the continuation of non-employment uses that have been lawfully established in employment areas. It is unclear whether Kitchener will be required to update policies in its official plan or whether the lawfully established non-employment uses will be grandfathered in employment areas.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • By when are the municipalities required to update employment areas identified in their official plans? • Will municipalities need to update their official plan policies to allow for continued use of lawfully established non-employment uses (commercial and institutional) within employment areas? |
| <p>4. Planning authorities may remove lands from <i>employment areas</i> only where it has been demonstrated that:</p> <p>a) there is an identified need for the removal and the land is not required for <i>employment area</i> uses over the long term;</p> <p>b) the proposed uses would not negatively impact the overall viability of the <i>employment area</i> by:</p> <ol style="list-style-type: none"> 1. avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts to | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.3.2.4, Policy 1.3.2.5 A Place to Grow – Section 2.2.5.9, 2.2.5.10</p> <p>What this means The policies regarding conversion of lands within employment areas are proposed to be significantly modified to remove reference to municipal comprehensive reviews and enable applications for removal of lands from employment areas at any time. The criteria to consider removal of lands from employment areas is largely the same.</p> |

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| <p>existing or planned <i>employment area</i> uses in accordance with policy 3.5; and</p> <p>2. maintaining access to <i>major goods movement facilities and corridors</i>;</p> <p>c) existing or planned <i>infrastructure</i> and <i>public service facilities</i> are available to accommodate the proposed uses.</p> | <p>It is noted that, under the <i>Planning Act</i>, there is no appeal in respect of refusal or failure to adopt or approve an amendment to remove lands from employment areas.</p> <p>Comments</p> <p>More flexibility is provided to enable removal of employment lands at any given time. Province should note that no appeal rights in place may deter applications for removal of lands from employment areas and must maintain the no appeal rights sections in this case. In light of this, there is merit in maintaining a comprehensive review approach, perhaps at a shorter time frame than currently in place, that would enable conversion or removal of lands from employment areas.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • Would a shorter timeframe for conducting comprehensive reviews for this purpose possible and beneficial? • Would it be beneficial to include policy that would enable addition of lands to employment areas, particularly those that may have been removed through this policy? |
| <p>2.9 Energy Conservation, Air Quality and Climate Change</p> | |
| <p>1. Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the <i>impacts of a changing climate</i> through approaches that:</p> <p>a) support the achievement of compact, <i>transit-supportive</i>, and <i>complete communities</i>;</p> <p>b) incorporate climate change considerations in planning for and the development of <i>infrastructure</i>, including stormwater management systems, and <i>public service facilities</i>;</p> <p>c) support energy conservation and efficiency;</p> <p>d) promote <i>green infrastructure</i>, <i>low impact development</i>, and <i>active transportation</i>, protect the environment and improve air quality; and</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section</p> <p>PPS 2020 – Policy 1.8.1 A Place to Grow – Section 4.2.9, 4.2.10</p> <p>What this means</p> <p>The proposed policy carries over the intent of existing policies of PPS 2020 and A Place to Grow but significantly condenses and modifies to be less prescriptive.</p> <p>Comments</p> <p>Although the intent to reduce greenhouse gas emissions and prepare for the impacts of a changing climate are maintained, there is much more flexibility provided. Municipalities can use different approaches to meet the intent of the policy. The policies also do not encourage municipalities to develop greenhouse gas inventories, or establish specific targets to reduce greenhouse gas emissions, which is part of policies in A Place to Grow.</p> |

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| <p>e) take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the <i>impacts of a changing climate</i>.</p> | <p>Questions of clarification None</p> |
| <p>Chapter 3: Infrastructure and Facilities</p> | |
| <p>3.1 General Policies for Infrastructure and Public Service Facilities</p> | |
| <p>1. <i>Infrastructure and public service facilities</i> shall be provided in an efficient manner while accommodating projected needs. <i>Planning for infrastructure and public service facilities</i> shall be coordinated and integrated with land use planning and growth management so that they: a) are financially viable over their life cycle, which may be demonstrated through asset management planning; b) leverage the capacity of development proponents, where appropriate; and c) are available to meet current and projected needs.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.1 A Place to Grow – NA</p> <p>What this means Reference to preparing for impacts of a changing climates is proposed to be deleted. This is however addressed through proposed policy 2.9 b). Proposed policy 3.1.1 b) “leverage the capacity of development proponents, where appropriate” is a new addition.</p> <p>It is also noted that definition of public service facilities is proposed to be updated to explicitly include schools, hospitals and community recreation facilities.</p> <p>Comments It is not clear what ‘leverage the capacity of development proponents’ would include. This addition appears to enable the use of credit service refund agreements that is used by municipalities including Kitchener to have the landowner upfront the costs of constructing and maintaining infrastructure prior to it being contemplated for in the infrastructure plans. Additionally, we question the intent behind broadening the definition of public service facilities.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • What would ‘leverage the capacity of development proponents’ include? |
| <p>2. Planning and investments in <i>infrastructure and public service facilities</i> should be prioritized to</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.2 A Place to Grow – NA</p> |

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| <p>support <i>strategic growth areas</i> as focal areas for growth and development.</p> | <p>What this means Policy 1.6.2 of PPS 2020 that promoted green infrastructure is proposed to be deleted. However, green infrastructure is promoted under proposed policy 2.9 and 3.6.8 for stormwater management purposes. In place, a new/modified policy is proposed that encourages prioritizing infrastructure and public service facilities to support strategic growth areas.</p> <p>Comments Prioritizing infrastructure and public service facilities to support strategic growth areas is supported.</p> <p>Questions of clarification None</p> |
| <p>3. Before consideration is given to developing new <i>infrastructure</i> and <i>public service facilities</i>: a) the use of existing <i>infrastructure</i> and <i>public service facilities</i> should be optimized; and b) opportunities for adaptive re-use should be considered, wherever feasible.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.3 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>4. <i>Infrastructure</i> and <i>public service facilities</i> should be strategically located to support the effective and efficient delivery of emergency management services, and to ensure the protection of public health and safety in accordance with the policies in Chapter 5: Protecting Public Health and Safety.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.4 A Place to Grow – NA</p> <p>What this means No change</p> |

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| | <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>5. <i>Public service facilities</i> should be co-located to promote cost-effectiveness and facilitate service integration, access to transit and <i>active transportation</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.5 A Place to Grow – NA</p> <p>What this means Minor change – “in community hubs, where appropriate” is proposed to be deleted.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>6. Planning authorities, in consultation with school boards, should consider and encourage innovative approaches in the design of schools and associated child care facilities, such as schools integrated in high-rise developments, in <i>strategic growth areas</i>, and other areas with a <i>compact built form</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – NA</p> <p>What this means New proposed policy that directs consideration and encouragement of innovative approaches that go beyond the traditional design of schools and childcare facilities, particularly in areas where there is compact built form.</p> <p>Comments Kitchener supports encouragement of innovative approaches to design of schools and childcare facilities in the Province.</p> <p>Questions of clarification None</p> |
| <p>3.2 Transportation Systems</p> | |

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| <p>1. <i>Transportation systems</i> should be provided which are safe, energy efficient, facilitate the movement of people and goods, and are appropriate to address projected needs.</p> <p>2. Efficient use should be made of existing and planned <i>infrastructure</i>, including through the use of <i>transportation demand management</i> strategies, where feasible.</p> <p>3. As part of a <i>multimodal</i> transportation system, connectivity within and among <i>transportation systems</i> and modes should be maintained and, where possible, improved including connections which cross jurisdictional boundaries.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.7.1, 1.6.7.2, 1.6.7.3, 1.6.7.4 A Place to Grow – NA</p> <p>What this means Policy 3.2.1, 3.2.2 and 3.2.3 are proposed to be carried forward from PPS 2020. Policy 1.6.7.4 in PPS 2020 is proposed to be deleted. This policy promotes land use pattern, density and mix of uses that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.</p> <p>Comments The deletion of Policy 1.6.7.4 in PPS 2020 seems to signal a shift in priorities away from reducing vehicle trips. Kitchener is not supportive of this deletion and requests the province consider retaining the policy.</p> <p>Questions of clarification None</p> |
| <p>3.3 Transportation and Infrastructure Corridors</p> | |
| <p>1. Planning authorities shall plan for and protect corridors and rights-of-way for <i>infrastructure</i>, including transportation, transit and electricity generation facilities and transmission systems to meet current and projected needs.</p> <p>2. <i>Major goods movement facilities and corridors</i> shall be protected for the long term.</p> <p>3. Planning authorities shall not permit <i>development</i> in <i>planned corridors</i> that could preclude or negatively affect the use of the corridor for the purpose(s) for which it was identified.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.8 A Place to Grow – NA</p> <p>What this means Policy 1.6.8.6 of PPS 2020 is proposed to be deleted. This policy directs consideration for significant resources when planning for significant transportation, electricity transmission, and infrastructure facilities.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |

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| <p>New <i>development</i> proposed on <i>adjacent lands</i> to existing or <i>planned corridors</i> and transportation facilities should be compatible with, and supportive of, the long-term purposes of the corridor and should be designed to avoid, or where avoidance is not possible, minimize and mitigate negative impacts on and from the corridor and transportation facilities.</p> <p>4. The preservation and reuse of abandoned corridors for purposes that maintain the corridor’s integrity and continuous linear characteristics should be encouraged, wherever feasible.</p> <p>5. The co-location of linear <i>infrastructure</i> should be promoted, where appropriate.</p> | |
| <p>3.4 Airports, Rail and Marine Facilities</p> | |
| <p>1. Planning for land uses in the vicinity of <i>airports</i>, <i>rail facilities</i> and <i>marine facilities</i> shall be undertaken so that:</p> <p>a) their long-term operation and economic role is protected; and</p> <p>b) <i>airports</i>, <i>rail facilities</i> and <i>marine facilities</i> and <i>sensitive land uses</i> are appropriately designed, buffered and/or separated from each other, in accordance with policy 3.5.</p> <p>2. <i>Airports</i> shall be protected from incompatible land uses and development by: a) prohibiting new residential <i>development</i> and other sensitive land uses in areas near <i>airports</i> above 30 NEF/NEP; b) considering redevelopment of existing residential uses and other sensitive land uses or infilling of residential and other sensitive land uses in areas</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.9 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |

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| <p>above 30 NEF/NEP only if it has been demonstrated that there will be no negative impacts on the long-term function of the <i>airport</i>; and c) discouraging land uses which may cause a potential aviation safety hazard.</p> | |
| <p>3.5 Land Use Compatibility</p> | |
| <p>1. <i>Major facilities</i> and <i>sensitive land uses</i> shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential <i>adverse effects</i> from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of <i>major facilities</i> in accordance with provincial guidelines, standards and procedures.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.2.6 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>2. Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other <i>major facilities</i> that are vulnerable to encroachment by ensuring that proposed adjacent <i>sensitive land uses</i> are only permitted if potential impacts to industrial, manufacturing or other <i>major facilities</i> are minimized and mitigated in accordance with provincial guidelines, standards and procedures.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.2.6 A Place to Grow – NA</p> <p>What this means The criteria for allowing new sensitive land uses to be located adjacent to major facilities when avoidance is not possible is proposed to be modified. PPS 2020 requires new sensitive land uses to demonstrate that: there is an identified need for the proposed use; there are no reasonable alternative locations; the adverse effects on the proposed sensitive uses will be minimized and mitigated; and, potential impacts to industrial, manufacturing or other uses are minimized and mitigated. The proposed policy only retains the requirement for proposed sensitive land uses to demonstrate that potential impacts to major facilities are minimized and mitigated. This lends a level of protection to the long-term viability of existing or planned industrial,</p> |

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| | <p>manufacturing and other major facilities from sensitive land uses, where avoidance is not possible.</p> <p>Comments There seems to be shift in focus from potential impacts on sensitive land uses, to impacts on existing or planned major facilities. It will still be required to demonstrate that avoidance of adverse effects is not possible.</p> <p>Questions of clarification None</p> |
| 3.6 Sewage, Water and Stormwater | |
| <p>1. Planning for <i>sewage and water services</i> shall:</p> <p>a) accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing <i>municipal sewage services</i> and <i>municipal water services</i> and existing <i>private communal sewage services</i> and <i>private communal water services</i>;</p> <p>b) ensure that these services are provided in a manner that:</p> <ol style="list-style-type: none"> 1. can be sustained by the water resources upon which such services rely; 2. is feasible and financially viable over their life cycle; 3. protects human health and safety, and the natural environment, including the <i>quality and quantity of water</i>; and 4. considers comprehensive municipal planning for these services, where applicable. <p>c) promote water and energy conservation and efficiency;</p> <p>d) integrate servicing and land use considerations at all stages of the planning process;</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.6.1 A Place to Grow – NA</p> <p>What this means Policy 1.6.6.1 of PPS 2020 is proposed to be modified and the key additions include consideration of comprehensive municipal planning for sewage and water services, promoting energy conservation and efficiency, integrating with source protection planning. The policy in relation servicing hierarchy is proposed to updated to servicing options. However, the intent of servicing hierarchy appears to be maintained in subsequent policies.</p> <p>Comments The Region of Waterloo, including Kitchener, is a ground water based community. Providing water and sewage services through municipal services is key to ensuring the safety and longevity of our water supply in the long term. While the PPS has always provided a servicing hierarchy, we are concerned with any changes that reduce our collective ability to determine servicing options that are best for our ground water based community.</p> <p>Questions of clarification None</p> |

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| <p>e) be in accordance with the servicing options outlined through policies 3.6.2, 3.6.3, 3.6.4 and 3.6.5; and f) integrate with source protection planning.</p> | |
| <p>2. <i>Municipal sewage services and municipal water services</i> are the preferred form of servicing for <i>settlement areas</i> to support protection of the environment and minimize potential risks to human health and safety. For clarity, <i>municipal sewage services and municipal water services</i> include both centralized servicing systems and decentralized servicing systems.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.6.2 A Place to Grow – NA</p> <p>What this means Minor change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>3. Where <i>municipal sewage services and municipal water services</i> are not available, planned or feasible, <i>private communal sewage services and private communal water services</i> are the preferred form of servicing for multi-unit/lot <i>development</i> to support protection of the environment and minimize potential risks to human health and safety.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.6.3 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>4. Where <i>municipal sewage services and municipal water services</i> or <i>private communal sewage services and private communal water services</i> are not available, planned or feasible, <i>individual on-site sewage services and individual on-site water services</i></p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.6.4 A Place to Grow – NA</p> <p>What this means</p> |

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| <p>may be used provided that site conditions are suitable for the long-term provision of such services with no <i>negative impacts</i>.</p> <p>At the time of the official plan review or update, planning authorities should assess the long-term impacts of <i>individual on-site sewage services</i> and <i>individual on-site water services</i> on environmental health and the financial viability or feasibility of other forms of servicing set out in policies 3.6.2 and 3.6.3.</p> | <p>Minor changes to condense the policy wording. Intent of the policy appears to be maintained.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>5. <i>Partial services</i> shall only be permitted in the following circumstances:</p> <p>a) where they are necessary to address failed <i>individual on-site sewage services</i> and <i>individual on-site water services</i> in existing development; or</p> <p>b) within <i>settlement areas</i>, to allow for infilling and minor rounding out of existing development on <i>partial services</i> provided that site conditions are suitable for the long-term provision of such services with no <i>negative impacts</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.6.5 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>6. In rural areas, where <i>partial services</i> have been provided to address failed services in accordance with policy 3.6.5 (a), infilling on existing lots of record may be permitted where this would represent a logical and financially viable connection to the existing <i>partial service</i> and provided that site conditions are suitable for the long-term provision of such services with no <i>negative impacts</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.6.5 A Place to Grow – NA</p> <p>What this means Minor change</p> <p>Comments No comments</p> <p>Questions of clarification</p> |

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| <p>7.Planning authorities may allow lot creation where there is confirmation of sufficient <i>reserve sewage system capacity</i> and <i>reserve water system capacity</i>.</p> | <p>None</p> <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.6.6 A Place to Grow – NA</p> <p>What this means Policy is proposed to be shortened with the intent maintained. Definition of reserve sewage system capacity and reserve water system capacity is proposed to be modified to include private communal systems. This modification in the definition is taken from the policy itself.</p> <p>Comments The update to definitions of reserve sewage and water system capacity to include private communal systems appears to be a result of condensing the policy. However, this may be concerning. Kitchener does not support private communal systems as it adds risks to inherit ownership of these systems in the future.</p> <p>Questions of clarification None</p> |
| <p>8.Planning for stormwater management shall: a)be integrated with planning for <i>sewage and water services</i> and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle; b)minimize, or, where possible, prevent increases in contaminant loads; c)minimize erosion and changes in water balance including through the use of <i>green infrastructure</i>; d)mitigate risks to human health, safety, property and the environment; e)maximize the extent and function of vegetative and pervious surfaces;</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.6.7 A Place to Grow – Section 3.2.7</p> <p>What this means Minor changes the integrate policy language from A Place to Grow for viability over full life cycle, and considering cumulative impacts of stormwater from development on a watershed scale.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |

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| <p>f)promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and <i>low impact development</i>; and g)align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a <i>watershed</i> scale.</p> | |
| 3.7 Waste Management | |
| <p>1. <i>Waste management systems</i> need to be planned for and provided that are of an appropriate size, type, and location to accommodate present and future requirements, and facilitate integrated waste management.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.10 A Place to Grow – NA</p> <p>What this means Policy 1.6.10 of PPS 2020 is proposed to be condensed. The overall intent of the existing policy appears to be carried forward.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| 3.8 Energy Supply | |
| <p>1.Planning authorities should provide opportunities for the development of energy supply including electricity generation facilities and transmission and distribution systems, district energy, and <i>renewable energy systems</i> and <i>alternative energy systems</i>, to accommodate current and projected needs.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.6.11.1 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> |

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| | <p>Questions of clarification None</p> |
| 3.9 Public Spaces, Recreation, Parks, Trails and Open Space | |
| <p>1. Healthy, active, and inclusive communities should be promoted by:</p> <p>a) planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate <i>active transportation</i> and community connectivity;</p> <p>b) planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;</p> <p>c) providing opportunities for public access to shorelines; and</p> <p>d) recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.5.1 A Place to Grow – NA</p> <p>What this means Minor changes which incorporate a more inclusive language.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| Chapter 4: Wise Use and Management of Resources | |
| 4.1 Natural Heritage | |
| <p>1. Natural features and areas shall be protected for the long term.</p> <p>2. The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.1 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> |

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| <p>3. Natural heritage systems shall be identified in Ecoregions 6E & 7E1, recognizing that natural heritage systems will vary in size and form in settlement areas, rural areas, and prime agricultural areas.</p> <p>4. Development and site alteration shall not be permitted in:</p> <p>a) significant wetlands in Ecoregions 5E, 6E and 7E1; and</p> <p>b) significant coastal wetlands.</p> <p>5. Development and site alteration shall not be permitted in:</p> <p>a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1;</p> <p>b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)¹;</p> <p>c) significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)¹;</p> <p>d) significant wildlife habitat;</p> <p>e) significant areas of natural and scientific interest; and</p> <p>f) coastal wetlands in Ecoregions 5E, 6E and 7E1 that are not subject to policy 4.1.4(b) unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.</p> <p>6. Development and site alteration shall not be permitted in fish habitat except in accordance with provincial and federal requirements.</p> <p>7. Development and site alteration shall not be permitted in habitat of endangered species and</p> | <p>Questions of clarification</p> <p>None</p> |

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| <p>threatened species, except in accordance with provincial and federal requirements.</p> <p>8. Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.</p> <p>9. Nothing in policy 4.1 is intended to limit the ability of agricultural uses to continue.</p> | |
| 4.2 Water | |
| <p>1.Planning authorities shall protect, improve or restore the <i>quality and quantity of water</i> by:</p> <p>a)using the <i>watershed</i> as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development;</p> <p>b)minimizing potential <i>negative impacts</i>, including cross-jurisdictional and cross-<i>watershed</i> impacts;</p> <p>c)identifying <i>water resource systems</i>;</p> <p>d)maintaining linkages and functions of <i>water resource systems</i>;</p> <p>e)implementing necessary restrictions on <i>development and site alteration</i> to:</p> <p>1.protect drinking water supplies and <i>designated vulnerable areas</i>; and</p> <p>2.protect, improve or restore <i>vulnerable</i> surface and ground water, and their <i>hydrologic functions</i>;</p> <p>f)planning for efficient and sustainable use of water resources, through practices for water conservation and sustaining water quality; and</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section</p> <p>PPS 2020 – Policy 2.2.1 A Place to Grow – NA</p> <p>What this means</p> <p>The proposed changes are minor and reflected elsewhere in the proposed PPS. Further, some of the proposed changes are related to an updated definition of water resource systems.</p> <p>Comments</p> <p>No comments</p> <p>Questions of clarification</p> <p>None</p> |

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| g)ensuring consideration of environmental lake capacity, where applicable. | |
| <p>2.<i>Development and site alteration</i> shall be restricted in or near <i>sensitive surface water features</i> and <i>sensitive ground water features</i> such that these features and their related <i>hydrologic functions</i> will be protected, improved or restored, which may require mitigative measures and/or alternative development approaches.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.2.2 A Place to Grow – NA</p> <p>What this means Minor change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>3.Municipalities are encouraged to undertake <i>watershed planning</i> to inform planning for <i>sewage and water services</i> and stormwater management, including <i>low impact development</i>, and the protection, improvement or restoration of the <i>quality and quantity of water</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – NA</p> <p>What this means New proposed policy encourages municipalities to undertake watershed planning.</p> <p>Comments Conservation authorities have been responsible for undertaking watershed planning in Ontario. With this proposed new policy, it is not clear if that responsibility will be transferred to municipalities. Kitchener continues to work collaboratively with the Region of Waterloo and Grand River Conservation Authority and area municipalities in the Region on watershed planning. Watershed planning is important to protect the quality and quantity of water for current and future generations. It is suggested that province consider and provide clear direction on who will be required to undertake watershed planning.</p> <p>Questions of clarification</p> |

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| | <ul style="list-style-type: none"> Request to clarify if municipalities or conservation authorities will be required to undertake watershed planning. |
| 4.3 Agriculture | |
| 4.3.1 General Policies for Agriculture | |
| <p>1. Planning authorities are encouraged to use an <i>agricultural system</i> approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the <i>agri-food network</i>.</p> <p>2. As part of the agricultural land base, <i>prime agricultural areas</i>, including <i>specialty crop areas</i>, shall be designated and protected for long-term use for agriculture.</p> <p>3. <i>Specialty crop areas</i> shall be given the highest priority for protection, followed by Canada Land Inventory Class 1, 2, and 3 lands, and any associated Class 4 through 7 lands within the <i>prime agricultural area</i>, in this order of priority.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.3.1, Policy 2.3.2 A Place to Grow – NA</p> <p>What this means Policy 2.3.1 and 2.3.2 of PPS 2020 are proposed to be rearranged but appear to largely maintain the intent of the policies.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| 4.3.2 Permitted Uses | |
| <p>1. In <i>prime agricultural areas</i>, permitted uses and activities are: <i>agricultural uses</i>, <i>agriculture-related uses</i> and <i>on-farm diversified uses</i> based on provincial guidance.</p> <p>Proposed <i>agriculture-related uses</i> and <i>on-farm diversified uses</i> shall be compatible with, and shall not hinder, surrounding agricultural operations. Criteria for these uses may be based on provincial guidance or municipal approaches, as set out in municipal planning documents, which achieve the same objectives.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.3.3.1 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |

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| <p>2. In <i>prime agricultural areas</i>, all types, sizes and intensities of <i>agricultural uses</i> and <i>normal farm practices</i> shall be promoted and protected in accordance with provincial standards.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.3.3.2 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>3. New land uses in <i>prime agricultural areas</i>, including the creation of lots and new or expanding livestock facilities, shall comply with the <i>minimum distance separation formulae</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.3.3.3 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>4. A principal dwelling associated with an agricultural operation may be permitted in <i>prime agricultural areas</i> as an agricultural use, in accordance with provincial guidance, except where prohibited in accordance with policy 4.3.3.1 b).</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – NA</p> <p>What this means New proposed policy to permit a principal dwelling in association with an agricultural operation as an agricultural use in prime agricultural areas, except where it has been prohibited for residence surplus to a farming operation severance.</p> |

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| | <p>Comments It is not clear if this policy would apply to remnant parcels of farmland created that are prohibited to have new residential dwellings.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • Will a principal dwelling allowed to be permitted on a remnant parcel of farmland created prior to January 1, 2023 through severance for a residence surplus to a farming operation where new residential dwellings have been previously prohibited? |
| <p>5. Subordinate to the principal dwelling, up to two additional residential units may be permitted in <i>prime agricultural areas</i>, provided that:</p> <p>a) any additional residential units are within, attached to, or in close proximity to the principal dwelling;</p> <p>b) any additional residential unit complies with the <i>minimum distance separation formulae</i>;</p> <p>c) any additional residential unit is compatible with, and would not hinder, surrounding agricultural operations; and</p> <p>d) appropriate <i>sewage and water services</i> will be provided.</p> <p>The additional residential units may only be severed from the lot containing the principal dwelling in accordance with policy 4.3.3.1.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – NA</p> <p>What this means New proposed policy to permit up to two additional dwelling units in association with a principal dwelling in prime agricultural areas. Both the dwellings could be attached, or detached, or a combination of attached of detached. The policy further enables severance of these additional dwelling units from the lot containing the principal dwelling.</p> <p>Comments This proposed policy has the potential to impact Ontario’s agricultural lands and operations, natural environment, and future comprehensive planning processes. Please see comments for proposed policy 4.3.3.1.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • When additional residential units are severed from a lot containing the principal dwelling which is considered as an agricultural use, would these new lots containing the additional residential units be considered agricultural use as well? • What would count as appropriate sewage and water services? |

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| | <ul style="list-style-type: none"> Has the province considered the potential complications when agricultural land adjacent to settlement areas begin to get fragmented due to new lot creation? |
| 4.3.3 Lot Creation and Lot Adjustments | |
| <p>1. Residential lot creation in <i>prime agricultural areas</i> is only permitted in accordance with provincial guidance for:</p> <p>a) new residential lots created from a lot or parcel of land that existed on January 1, 2023, provided that:</p> <ol style="list-style-type: none"> agriculture is the principal use of the existing lot or parcel of land; the total number of lots created from a lot or parcel of land as it existed on January 1, 2023 does not exceed three; any residential use is compatible with, and would not hinder, surrounding agricultural operations; and any new lot: <ol style="list-style-type: none"> is located outside of a <i>specialty crop area</i>; complies with the <i>minimum distance separation formulae</i>; will be limited to the minimum size needed to accommodate the use while still ensuring appropriate <i>sewage and water services</i>; has existing access on a public road, with appropriate frontage for ingress and egress; and is adjacent to existing non-agricultural land uses or consists primarily of lower-priority agricultural lands. <p>b) a <i>residence surplus to an agricultural operation</i> as a result of farm consolidation, provided that:</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.3.4.1 c) A Place to Grow – NA</p> <p>What this means Proposed policy 4.3.3.1 a) is a new addition that permits a maximum of three new residential lots to be created from a lot that existed as on January 1, 2023. The additional dwelling units created through proposed policy 4.3.2.5 can be severed as long as the prescribed criteria is met. Lot creation policy in case of residence surplus to an agricultural operation is carried forward.</p> <p>Comments This proposed policy, as with proposed policy 4.3.2.5, has the potential to impact Ontario’s agricultural lands and operations, natural environment, and future comprehensive planning processes. In Kitchener, there is the potential of fragmenting Kitchener’s existing prime agricultural lands adjacent to its settlement areas not only presenting challenges to its continued use as agricultural land, but may make it more complex to comprehensively plan should future settlement area expansions be determined to be needed for growth beyond the current 2051 planning horizon. It is recommended that this proposed policy be removed or at a minimum reconsidered.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> Will the remnant parcel of farmland created through severance for a residence surplus to a farming operation where new residential dwellings have been prohibited, allowed to be further severed as per proposed policy 4.3.3.1 a)? What happens to lots that existed on January 1, 2023 but do not anymore when the proposed PPS comes into effect? |

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| <p>1. the new lot will be limited to a minimum size needed to accommodate the use while still ensuring appropriate <i>sewage and water services</i>; and</p> <p>2. the planning authority ensures that new residential dwellings are prohibited on any remnant parcel of farmland created by the severance. The approach used to ensure that no new residential dwellings are permitted on the remnant parcel may be recommended by the Province, or based on municipal approaches which achieve the same objective.</p> | |
| <p>2. Official plans and zoning by-laws shall not contain provisions that are more restrictive than policy 4.3.3.1 (a) except to address public health or safety concerns.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – NA</p> <p>What this means New proposed policy which mandates the lot creation policies in prime agricultural areas and prohibits municipal official plans and zoning by-laws to have more restrictive provisions.</p> <p>Comments New residential lot creation policies should be reconsidered. Refer to comments for proposed policy 4.3.3.1 above.</p> <p>Questions of clarification None</p> |
| <p>3. Non-residential lot creation in <i>prime agricultural areas</i> is discouraged and may only be permitted, in accordance with provincial guidance, for: a) <i>agricultural uses</i>, provided that the lots are of a size appropriate for the type of agricultural use(s) common in the area and are sufficiently large to</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.3.4.1 a), b) and d) A Place to Grow – NA</p> <p>What this means Policies of PPS 2020 are proposed to be rearranged maintaining the original intent.</p> |

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| <p>maintain flexibility for future changes in the type or size of agricultural operations;</p> <p>b) <i>agriculture-related uses</i>, provided that any new lot will be limited to a minimum size needed to accommodate the use while still ensuring appropriate <i>sewage and water services</i>; and</p> <p>c) <i>infrastructure</i>, where the facility or corridor cannot be accommodated through the use of easements or rights-of-way.</p> | <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>4. Lot adjustments in <i>prime agricultural areas</i> may be permitted for <i>legal or technical reasons</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.3.4.2 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>4.3.4 Removal of Land from Prime Agricultural Areas</p> | |
| <p>1. Planning authorities may only exclude land from <i>prime agricultural areas</i> for expansions of or identification of <i>settlement areas</i> in accordance with policy 2.3.4.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.3.5.1 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification</p> |

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| | None |
| 4.3.5 Non-Agricultural Uses in Prime Agricultural Areas | |
| <p>1. Planning authorities may only permit non-agricultural uses in <i>prime agricultural areas</i> for: a) extraction of <i>minerals, petroleum resources</i> and <i>mineral aggregate resources</i>; or b) limited non-residential uses, provided that all of the following are demonstrated: 1. the land does not comprise a <i>specialty crop area</i>;</p> <p>2. the proposed use complies with the <i>minimum distance separation formulae</i>;</p> <p>3. there is an identified need within the planning horizon provided for in policy 2.1.1 for additional land to accommodate the proposed use; and</p> <p>4. alternative locations have been evaluated, and i. there are no reasonable alternative locations which avoid <i>prime agricultural areas</i>; and ii. there are no reasonable alternative locations in <i>prime agricultural areas</i> with lower priority agricultural lands.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.3.6.1 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>2. Impacts from any new or expanding non-agricultural uses on surrounding agricultural lands and operations are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an <i>agricultural impact assessment</i> or equivalent analysis, based on provincial guidance.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.3.6.2 A Place to Grow – NA</p> <p>What this means Policy 2.3.6.2 is proposed to be updated to provide a more restrictive lens on the impacts from any new or expanding non-agricultural uses on surrounding agricultural lands to be avoided or minimized and mitigated through an agricultural impact assessment.</p> <p>Comments No comments</p> |

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| | <p>Questions of clarification None</p> |
| 4.4 Minerals and Petroleum | |
| <p>4.4.1 General Policies for Minerals and Petroleum 1. <i>Minerals</i> and <i>petroleum resources</i> shall be protected for long-term use.</p> <p>4.4.2 Protection of Long-Term Resource Supply 1. <i>Mineral mining operations</i> and <i>petroleum resource operations</i> shall be identified and protected from <i>development</i> and activities that would preclude or hinder their expansion or continued use or which would be incompatible for reasons of public health, public safety or environmental impact.</p> <p>2. Known <i>mineral deposits</i>, known <i>petroleum resources</i> and <i>significant areas of mineral potential</i> shall be identified and <i>development</i> and activities in these resources or on <i>adjacent lands</i> which would preclude or hinder the establishment of new operations or access to the resources shall only be permitted if:</p> <p>a) resource use would not be feasible; or b) the proposed land use or development serves a greater long-term public interest; and c) issues of public health, public safety and environmental impact are addressed.</p> <p>4.4.3 Rehabilitation 1. Rehabilitation to accommodate subsequent land uses shall be required after extraction and other related activities have ceased. Progressive rehabilitation should be undertaken wherever feasible.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.4 A Place to Grow – NA</p> <p>What this means No changes</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |

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| <p>4.4.4 Extraction in Prime Agricultural Areas</p> <p>1. Extraction of <i>minerals</i> and <i>petroleum resources</i> is permitted in <i>prime agricultural areas</i> provided that the site will be rehabilitated.</p> | |
| <p>4.5 Mineral Aggregate Resources</p> | |
| <p>4.5.1 General Policies for Mineral Aggregate Resources</p> <p>1. <i>Mineral aggregate resources</i> shall be protected for long-term use and, where provincial information is available, <i>deposits of mineral aggregate resources</i> shall be identified.</p> <p>4.5.2 Protection of Long-Term Resource Supply</p> <p>1. As much of the <i>mineral aggregate resources</i> as is realistically possible shall be made available as close to markets as possible.</p> <p>Demonstration of need for <i>mineral aggregate resources</i>, including any type of supply/demand analysis, shall not be required, notwithstanding the availability, designation or licensing for extraction of <i>mineral aggregate resources</i> locally or elsewhere.</p> <p>2. Extraction shall be undertaken in a manner which minimizes social, economic and environmental impacts.</p> <p>3. <i>Mineral aggregate resource conservation</i> shall be undertaken, including through the use of accessory aggregate recycling facilities within operations, wherever feasible.</p> <p>4. <i>Mineral aggregate operations</i> shall be protected from <i>development</i> and activities that would preclude or hinder their expansion or continued use or which would be incompatible for reasons of public health, public safety or environmental impact. Existing <i>mineral aggregate operations</i> shall be</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.5 A Place to Grow – NA</p> <p>What this means Section 2.5 of PPS 2020 is proposed to be largely carried forward. There are some changes proposed for policy 2.5.4 Extraction in Prime Agricultural Areas in PPS 2020. The proposed changes are reflective of the changes proposed in the Agriculture section. Couple of policy tests that enable not requiring complete rehabilitation of agricultural conditions related to specialty crop areas and consideration of other alternatives are proposed to be deleted.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |

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permitted to continue without the need for official plan amendment, rezoning or development permit under the *Planning Act*. Where the *Aggregate Resources Act* applies, only processes under the *Aggregate Resources Act* shall address the depth of extraction of new or existing *mineral aggregate operations*. When a license for extraction or operation ceases to exist, policy 4.5.2.5 continues to apply.

5. In known *deposits of mineral aggregate resources* and on *adjacent lands, development* and activities which would preclude or hinder the establishment of new operations or access to the resources shall only be permitted if: a) resource use would not be feasible; or
b) the proposed land use or development serves a greater long-term public interest; and
c) issues of public health, public safety and environmental impact are addressed.

4.5.3 Rehabilitation

1. Progressive and final rehabilitation shall be required to accommodate subsequent land uses, to promote land use compatibility, to recognize the interim nature of extraction, and to mitigate negative impacts to the extent possible. Final rehabilitation shall take surrounding land use and approved land use designations into consideration.

2. *Comprehensive rehabilitation* planning is encouraged where there is a concentration of mineral aggregate operations.

3. In parts of the Province not designated under the *Aggregate Resources Act*, rehabilitation standards that are compatible with those under the Act should

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| <p>be adopted for extraction operations on private lands.</p> <p>4.5.4 Extraction in Prime Agricultural Areas</p> <p>1. In <i>prime agricultural areas</i>, on <i>prime agricultural land</i>, extraction of <i>mineral aggregate resources</i> is permitted as an interim use provided that: a) impacts to the <i>prime agricultural areas</i> are addressed, in accordance with policy 4.3.5.2; and b) the site will be rehabilitated back to an <i>agricultural condition</i>.</p> <p>2. Despite policy 4.5.4.1 (b), complete rehabilitation to an <i>agricultural condition</i> is not required if: a) the depth of planned extraction makes restoration of pre-extraction agricultural capability unfeasible; and b) agricultural rehabilitation in remaining areas is maximized.</p> <p>4.5.5 Wayside Pits and Quarries, Portable Asphalt Plants and Portable Concrete Plants</p> <p>1. <i>Wayside pits and quarries, portable asphalt plants and portable concrete plants</i> used on public authority contracts shall be permitted, without the need for an official plan amendment, rezoning, or development permit under the <i>Planning Act</i> in all areas, except those areas of existing development or particular environmental sensitivity which have been determined to be incompatible with extraction and associated activities.</p> | |
| 4.6 Cultural Heritage and Archaeology | |
| <p>1. <i>Protected heritage property</i>, which may contain <i>built heritage resources</i> or <i>cultural heritage landscapes</i>, shall be <i>conserved</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section</p> <p>PPS 2020 – Policy 2.6.1 A Place to Grow – NA</p> <p>What this means</p> |

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| | <p>Policy 2.6.1 of PPS 2020 is proposed to be modified to replace significant built heritage resources and significant cultural heritage landscapes with protected heritage property. Further, the definition of protected heritage property is proposed to be updated to include properties that are listed on the City’s Municipal Heritage Register, designated under Part IV, V, or VI of the Ontario Heritage Act, or if a property has an easement agreement with the City.</p> <p>Comments Many municipalities maintain inventories of cultural heritage resources that are believed to have cultural heritage value but need further research for that to be confirmed. With the proposed changes, the policy will not apply to properties that are on Kitchener’s Inventory of Built Heritage Resources. Staff will not be able to apply this policy when asking for Heritage Impact Assessments or other related heritage information for properties that are on the Inventory. Furthermore, there are many properties that are currently listed as non-designated properties of cultural heritage value that might not have design value but have significant historical and/or contextual value. Kitchener is concerned that these changes will diminish a municipality’s ability to designate significant cultural heritage resources, where they are evaluated to determine their significance resulting in potential significant loss of Kitchener’s cultural heritage. There is an opportunity to update the policy and reflect the evolving practice of heritage conservation rather than continuing to focus on built heritage.</p> <p>Questions of clarification None</p> |
| <p>2. Planning authorities shall not permit <i>development</i> and <i>site alteration</i> on lands containing <i>archaeological resources</i> or <i>areas of archaeological potential</i> unless the <i>archaeological resources</i> have been <i>conserved</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.6.2 A Place to Grow – NA</p> <p>What this means Minor changes</p> <p>Comments No comments</p> |

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| | <p>Questions of clarification None</p> |
| <p>3. Planning authorities shall not permit <i>development and site alteration on adjacent lands to protected heritage property</i> unless the <i>heritage attributes</i> of the <i>protected heritage property</i> will be <i>conserved</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.6.3 A Place to Grow – NA</p> <p>What this means Definition of ‘adjacent’ is proposed to be updated. In PPS 2020, adjacent is defined as lands contiguous across a right-of-way or otherwise defined in a municipal official plan. The proposed change removes the ‘otherwise defined in the municipal official plan’ in the definition of adjacent with respect to this policy.</p> <p>Comments This change has the potential to effect Kitchener’s current practice of asking for Heritage Impact Assessments and other heritage documentation for development applications that are across the right-of-way. The use of HIAs in these cases can be important in assessing potential impacts of development.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> Request to clarify that properties across the right-of-way of protected heritage property can be considered ‘adjacent’ for the purposed of this policy. |
| <p>4. Planning authorities are encouraged to develop and implement: a) archaeological management plans for conserving <i>archaeological resources</i>; and b) proactive strategies for identifying properties for evaluation under the <i>Ontario Heritage Act</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.6.4 A Place to Grow – NA</p> <p>What this means Policy is proposed to be expanded to encourage development and implementation of proactive strategies for identifying properties for evaluation under the Ontario Heritage Act.</p> <p>Comments</p> |

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| | <p>It is not clear what “proactive strategies” would be included in this policy.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • Further direction is required on what “proactive strategies” can municipalities implement for identifying properties for evaluation under the <i>Ontario Heritage Act</i>. For example, management of archaeological resources is done through Archaeological Management Plans- which is clearly stated in the PPS. Should the same be looked at for listed properties on the City’s Municipal Heritage Register so that they are designated before the two-year period ends? |
| <p>5. Planning authorities shall engage early with Indigenous communities and ensure their interests are considered when identifying, protecting and managing <i>archaeological resources, built heritage resources and cultural heritage landscapes</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 2.6.5 A Place to Grow – NA</p> <p>What this means Minor changes to ensure early engagement with indigenous communities</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| Chapter 5: Protecting Public Health and Safety | |
| <p>5.1 General Policies for Natural and Human-Made Hazards</p> <p>1. Development shall be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Chapter 3.0 A Place to Grow – NA</p> <p>What this means Introduction to Chapter 3: Protecting Public Health and Safety in PPS 2020 is modified and proposed as a general policy.</p> <p>Comments No comments</p> |

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| | <p>Questions of clarification None</p> |
| <p>5.2 Natural Hazards</p> <p>1. Planning authorities shall identify <i>hazardous lands</i> and <i>hazardous sites</i> and manage development in these areas, in accordance with provincial guidance.</p> <p>2. Development shall generally be directed to areas outside of: a) <i>hazardous lands</i> adjacent to the shorelines of the <i>Great Lakes - St. Lawrence River System</i> and <i>large inland lakes</i> which are impacted by <i>flooding hazards, erosion hazards</i> and/or <i>dynamic beach hazards</i>;</p> <p>b) <i>hazardous lands</i> adjacent to <i>river, stream and small inland lake systems</i> which are impacted by <i>flooding hazards</i> and/or <i>erosion hazards</i>; and</p> <p>c) <i>hazardous sites</i>.</p> <p>3. <i>Development</i> and <i>site alteration</i> shall not be permitted within: a) the <i>dynamic beach hazard</i>;</p> <p>b) <i>defined portions of the flooding hazard along connecting channels</i> (the St. Marys, St. Clair, Detroit, Niagara and St. Lawrence Rivers);</p> <p>c) areas that would be rendered inaccessible to people and vehicles during times of <i>flooding hazards, erosion hazards</i> and/or <i>dynamic beach hazards</i>, unless it has been demonstrated that the site has safe access appropriate for the nature of the <i>development</i> and the natural hazard; and</p> <p>d) a <i>floodway</i> regardless of whether the area of inundation contains high points of land not subject to flooding.</p> <p>4. Planning authorities shall prepare for the <i>impacts of a changing climate</i> that may increase the risk associated with natural hazards.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Section 3.1 A Place to Grow – NA</p> <p>What this means Most of this section is carried forward from section 3.1 of PPS 2020. Proposed policy 5.2.1 is a new addition which requires planning authorities to identify hazardous lands and sites and manage development in these areas.</p> <p>Comments Hazardous lands and hazardous site have historically been identified through consultation and collaboration with conservation authorities. It is unclear whether the role of conservation authorities is intended to be transferred to planning authorities, and whether planning authorities would have the necessary expertise and resource capacity to undertake such an exercise.</p> <p>Questions of clarification</p> <ul style="list-style-type: none"> • What would constitute provincial guidance in relation to Policy 5.2.1? Would this include guidance by conservation authorities? |

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| <p>5. Despite policy 5.2.3, <i>development</i> and <i>site alteration</i> may be permitted in certain areas associated with the <i>flooding hazard</i> along <i>river, stream and small inland lake systems</i>: a) in those exceptional situations where a <i>Special Policy Area</i> has been approved. The designation of a <i>Special Policy Area</i>, and any change or modification to the official plan policies, land use designations or boundaries applying to <i>Special Policy Area</i> lands, must be approved by the Ministers of Municipal Affairs and Housing and Natural Resources and Forestry prior to the approval authority approving such changes or modifications; or</p> <p>b) where the <i>development</i> is limited to uses which by their nature must locate within the <i>floodway</i>, including flood and/or erosion control works or minor additions or passive non-structural uses which do not affect flood flows.</p> <p>6. <i>Development</i> shall not be permitted to locate in <i>hazardous lands</i> and <i>hazardous sites</i> where the use is: a) an <i>institutional use</i> including hospitals, long-term care homes, retirement homes, pre-schools, school nurseries, day cares and schools;</p> <p>b) an <i>essential emergency service</i> such as that provided by fire, police and ambulance stations and electrical substations; or</p> <p>c) uses associated with the disposal, manufacture, treatment or storage of <i>hazardous substances</i>.</p> <p>7. Where the <i>two zone concept</i> for <i>flood plains</i> is applied, <i>development</i> and <i>site alteration</i> may be permitted in the <i>flood fringe</i>, subject to appropriate floodproofing to the <i>flooding hazard</i> elevation or</p> | |

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| <p>another <i>flooding hazard</i> standard approved by the Minister of Natural Resources and Forestry.</p> <p>8. Further to policy 5.2.7, and except as prohibited in policies 5.2.3 and 5.2.6, <i>development</i> and <i>site alteration</i> may be permitted in those portions of <i>hazardous lands</i> and <i>hazardous sites</i> where the effects and risk to public safety are minor, could be mitigated in accordance with provincial standards, and where all of the following are demonstrated and achieved: a) <i>development</i> and <i>site alteration</i> is carried out in accordance with <i>floodproofing standards</i>, <i>protection works standards</i>, and <i>access standards</i>;</p> <p>b) vehicles and people have a way of safely entering and exiting the area during times of flooding, erosion and other emergencies;</p> <p>c) new hazards are not created and existing hazards are not aggravated; and</p> <p>d) no adverse environmental impacts will result.</p> <p>9. <i>Development</i> shall generally be directed to areas outside of lands that are unsafe for development due to the presence of <i>hazardous forest types for wildland fire</i>.</p> <p><i>Development</i> may however be permitted in lands with <i>hazardous forest types for wildland fire</i> where the risk is mitigated in accordance with <i>wildland fire assessment and mitigation standards</i>.</p> | |
| <p>5.3 Human-Made Hazards</p> <p>1. Development on, abutting or adjacent to lands affected by <i>mine hazards</i>; <i>oil, gas and salt hazards</i>; or former <i>mineral mining operations</i>, <i>mineral aggregate operations</i> or <i>petroleum resource</i></p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section</p> <p>PPS 2020 – Section 3.2 A Place to Grow – NA</p> <p>What this means</p> |

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| <p><i>operations</i> may be permitted only if rehabilitation or other measures to address and mitigate known or suspected hazards are under way or have been completed.</p> <p>2. Sites with contaminants in land or water shall be assessed and remediated as necessary prior to any activity on the site associated with the proposed use such that there will be no <i>adverse effects</i>.</p> | <p>Policy 3.2.3 in PPS 2020 is proposed to be deleted. This policy supports on-site and local re-use of excess soil through planning and development approvals.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| Chapter 6: Implementation and Interpretation | |
| 6.1 General Policies for Implementation and Interpretation | |
| <p>1. This Policy Statement shall be read in its entirety and all relevant policies are to be applied to each situation.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 4.2 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>2. This Policy Statement shall be implemented in a manner that is consistent with the recognition and affirmation of existing Aboriginal and treaty rights in section 35 of the <i>Constitution Act, 1982</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 4.3 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> |

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| | <p>Questions of clarification None</p> |
| <p>3. This Policy Statement shall be implemented in a manner that is consistent with <i>Ontario Human Rights Code</i> and the <i>Canadian Charter of Rights and Freedoms</i>.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 4.4 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>4. When implementing this Policy Statement, the Minister of Municipal Affairs and Housing may make decisions that take into account other considerations to balance government priorities.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 4.5 A Place to Grow – NA</p> <p>What this means Minor change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>5. Official plans shall identify provincial interests and set out appropriate land use designations and policies. Official plans shall provide clear, reasonable and attainable policies to protect provincial interests and facilitate development in suitable areas.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 4.6 A Place to Grow – NA</p> <p>What this means</p> |

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| <p>In order to protect provincial interests, planning authorities shall keep their official plans up-to-date with this Policy Statement. The policies of this Policy Statement continue to apply after adoption and approval of an official plan.</p> | <p>Policy 4.6 of PPS 2020 is proposed to be modified. Parts of the policy are moved to the preamble, including “official plan is the most important vehicle for implementation of this....”. Parts of the preamble are brought forward into this policy, including “official plans shall provide clear, reasonable and attainable policies to protect provincial interests and facilitate development in suitable areas”. The intent of the policy appears to be maintained.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>6. Planning authorities shall keep their zoning and development permit by-laws up-to-date with their official plans and this Policy Statement by establishing permitted uses, minimum densities, heights and other development standards to accommodate growth and development.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – NA</p> <p>What this means New proposed policy that directs planning authorities to keep their zoning and development permit by-laws up to date.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>7. Where a planning authority must decide on a planning matter before their official plan has been updated to be consistent with this Policy Statement, or before other applicable planning instruments have been updated accordingly, it must still make a decision that is consistent with this Policy Statement.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – NA</p> <p>What this means New proposed policy that requires a planning authority to be consistent with the proposed PPS when deciding on a planning matter before the planning instruments have been appropriately updated.</p> |

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| | <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>8. In addition to land use approvals under the <i>Planning Act</i>, <i>infrastructure</i> may also have requirements under other legislation and regulations. For example, an environmental assessment process may be required for new <i>infrastructure</i> and modifications to existing <i>infrastructure</i> under applicable legislation. Wherever possible and practical, approvals under the <i>Planning Act</i> and other legislation or regulations should be integrated provided the intent and requirements of both processes are met.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 4.7 A Place to Grow – NA</p> <p>What this means Minor changes</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>9. To assess progress on implementation of this Policy Statement, the Province may: a) identify key indicators to measure the outcomes, relevance and efficiency of the policies in this Policy Statement in consultation with municipalities, Indigenous communities, other public bodies and stakeholders; b) monitor and assess the implementation of this Policy Statement through the collection and analysis of data under each indicator; and c) consider the resulting assessment in each review of this Policy Statement.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 4.8 A Place to Grow – NA</p> <p>What this means Policy 4.8 of PPS 2020 is proposed to be updated. The current policy is directive towards the Province requiring monitoring process of the policy statement to be identified. This direction is proposed to be changed to say that the Province ‘may’ identify such monitoring process. The overall intent of the proposed policy appears to be diluted.</p> <p>Comments Periodic monitoring and review is an important part in land use policy planning which allows performance and timely updates to policy if required. The province should consider maintaining the directive language of the current policy.</p> |

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| | <p>Questions of clarification None</p> |
| <p>10. Municipalities are encouraged to monitor and report on the implementation of the policies in their official plans, in accordance with any requirements for reporting planning information to the Province, and data standards and including through any other guidelines that may be issued by the Minister.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 4.9 A Place to Grow – NA</p> <p>What this means Minor changes</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>11. <i>Strategic growth areas</i> are not land use designations and their delineation does not confer any new land use designations, nor alter existing land use designations. Any development on lands within the boundary of these identified areas is still subject to the relevant provincial and municipal land use planning policies and approval processes.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – Section 5.2.5.8</p> <p>What this means Proposed new policy adopted from A Place to Grow.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| 6.2 Coordination | |
| <p>1. A coordinated, integrated and comprehensive approach should be used when dealing with planning matters within municipalities, across lower, single and/or upper-tier municipal boundaries, and with other orders of government, agencies, boards,</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.2.1 A Place to Grow – NA</p> <p>What this means</p> |

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| <p>and Service Managers including: a) managing and/or promoting growth and development that is integrated with planning for <i>infrastructure</i> and <i>public service facilities</i>, including schools and associated child care facilities;</p> <p>b) economic development strategies;</p> <p>c) managing natural heritage, water, agricultural, mineral, and cultural heritage and archaeological resources;</p> <p>d) <i>infrastructure, multimodal transportation systems, public service facilities and waste management systems</i>;</p> <p>e) ecosystem, shoreline, watershed, and Great Lakes related issues;</p> <p>f) natural and human-made hazards;</p> <p>g) population, housing and employment projections, based on <i>regional market areas</i>, as appropriate; and</p> <p>h) addressing housing needs in accordance with provincial housing policies and plans, including those that address homelessness.</p> | <p>Policy 1.2.1 of PPS 2020 is proposed to be modified to use a coordinated, integrated and comprehensive approach when dealing with planning matters with ‘boards and Service Managers’. Further, integration with planning for ‘infrastructure and public facilities, including schools and associated child care facilities’ is explicitly added in.</p> <p>Comments The expansion of undertaking a coordinated, integrated and comprehensive approach when dealing with planning matters is supported.</p> <p>Questions of clarification None</p> |
| <p>2. Planning authorities shall undertake early engagement with Indigenous communities and coordinate on land use planning matters to facilitate knowledge-sharing, support consideration of Indigenous interests in land use decision-making and support the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.2.2 A Place to Grow – NA</p> <p>What this means Policy 1.2.2 of PPS 2020 is proposed to be modified to require planning authorities to undertake early engagement with Indigenous communities and clearly states the purpose to do so, including: to facilitate knowledge-sharing, support consideration of Indigenous interests in land use decision making; and support the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights.</p> <p>Comments</p> |

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| | <p>Kitchener supports early engagement and coordination with Indigenous communities in land use planning matters.</p> <p>Questions of clarification None</p> |
| <p>3. Planning authorities are encouraged to engage the public and stakeholders early in local efforts to implement this Policy Statement, and to provide the necessary information to ensure the informed involvement of local citizens, including equity-deserving groups.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – NA</p> <p>What this means Proposed new policy that encourages to engage the public and stakeholders early in local efforts to implement this Policy Statement.</p> <p>Comments This proposed policy seems to be only in place until other municipal planning instruments are updated to be consistent with the policy statement. The policy would appear to be redundant once the planning instruments implement the policy statement.</p> <p>Questions of clarification None</p> |
| <p>4. Planning authorities and school boards shall collaborate to facilitate early and integrated planning for schools and associated child care facilities to meet current and future needs.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – NA</p> <p>What this means Proposed new policy that directs planning authorities and school boards to collaborate to facilitate early and integrated planning for schools and associated child care facilities to meet current and future needs.</p> <p>Comments Kitchener has worked collaboratively with the school boards to plan for school facilities to meet current and future needs. For example, all school boards are currently</p> |

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| | <p>involved in the city’s secondary plan process for a new greenfield community in south-west Kitchener. Kitchener supports this proposed policy.</p> <p>Questions of clarification None</p> |
| <p>5. Planning authorities should coordinate emergency management and other economic, environmental and social planning considerations to support efficient and resilient communities.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.2.3 A Place to Grow – NA</p> <p>What this means No change</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>6. Municipalities, the Province, and other appropriate stakeholders are encouraged to undertake a coordinated approach to planning for large areas with high concentrations of employment uses that cross municipal boundaries.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – NA A Place to Grow – NA</p> <p>What this means Proposed new policy that encourages undertaking a coordinated approach focusing on large areas with high concentrations of employment uses that cross municipal boundaries.</p> <p>Comments This policy appears to apply to all large areas with high concentrations of employment uses that cross municipal boundaries. However, it is not clear if this would also apply to or be exclusively applicable to provincially significant employment zones.</p> <p>Questions of clarification</p> |

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| | <ul style="list-style-type: none"> Is this policy intended to only apply to provincially significant employment zones? |
| <p>7. Where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with lower-tier municipalities shall:</p> <p>a) identify and allocate population, housing and employment projections for lower-tier municipalities;</p> <p>b) identify areas where growth and development will be focused, including <i>strategic growth areas</i>, and establish any applicable minimum density targets;</p> <p>c) identify minimum density targets for growth and development taking place in new or expanded <i>settlement areas</i>, where applicable; and</p> <p>d) provide policy direction for the lower-tier municipalities on matters that cross municipal boundaries.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.2.4 A Place to Grow – NA</p> <p>What this means Policy 1.2.4 of PPS 2020 is proposed to be modified by deleting reference to provincial plans, policy 1.2.4 c) and d) that are related to identifying areas where growth and development will be focused and establishing intensification and density targets, and adding policy that is related to establishing minimum density targets for strategic growth areas and new or expanded settlement areas.</p> <p>Comments No comments</p> <p>Questions of clarification None</p> |
| <p>8. Where there is no upper-tier municipality or where planning is not conducted by an upper-tier municipality, planning authorities shall ensure that policy 6.2.7 is addressed as part of the planning process, and should coordinate these matters with adjacent planning authorities.</p> | <p>Equivalent and/or related PPS 2020 policy and/or A Place to Grow section PPS 2020 – Policy 1.2.5 A Place to Grow – NA</p> <p>What this means Minor change that adds upper-tier municipalities without planning responsibilities.</p> <p>Comments Kitchener will be required to coordinate with its adjacent municipalities on matters including: identification and allocation of population, housing and employment; identification of areas where growth and development will be focused; establishing minimum density targets for strategic growth areas; identifying minimum density targets for growth and development taking place in new or expanded settlement areas; and policy direction on matters that cross municipal boundaries.</p> |

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| | Questions of clarification None |

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| 7: Definitions | |
| Access standards | No change proposed. No comments. |
| Active transportation | No change proposed. No comments. |
| Additional needs housing | Proposed to replace “special needs” (housing). Kitchener is supportive of more ‘inclusive’ terminology. |
| Adjacent lands | No change proposed. No comments. |
| Adverse effect | No change proposed. No comments. |
| Affordable | Definition for “affordable” and related “low and moderate income households” is proposed to be deleted. Kitchener is a strong proponent of a supply of housing along the housing continuum, which includes options for affordable housing. Housing options must include housing that is affordable in relation to economic requirements and income levels of the community, a concept which is proposed to be withdrawn. |
| Agricultural condition | Minor change. No comments. |
| Agricultural impact assessment | New definition proposed. Kitchener is supportive of this definition clarifying what an agricultural impact assessment is. |
| Agricultural system | Minor change. No comments. |
| Agricultural uses | Minor change. No comments. |
| Agri-food network | No change proposed. No comments. |
| Agri-tourism uses | No change proposed. No comments. |
| Agriculture-related uses | No change proposed. No comments. |
| Airports | No change proposed. No comments. |
| Alternative energy system | No change proposed. No comments. |
| Archaeological resources | Minor change. No comments. |
| Areas of archaeological potential | Minor change. No comments. |

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| Areas of mineral potential | No change proposed. No comments. |
| Areas of natural and scientific interest | No change proposed. No comments. |
| Brownfield sites | No change proposed. No comments. |
| Built heritage resource | Proposed to be modified to delete “Built heritage resources are located on property that may be designated under Parts IV or V of the Ontario Heritage Act, or that may be included on local, provincial, federal and/or international registers.” No comments. |
| Coastal wetland | No change proposed. No comments. |
| Compact built form | Definition of ‘compact built form’ is proposed to be adopted from A Place to Grow. No comments. |
| Comprehensive rehabilitation | No change proposed. No comments. |
| Comprehensive review | The definition and concept of “comprehensive review” is proposed to be deleted from the proposed PPS. The comprehensive review process has been effective in ensuring a balanced, policy-led approach to assess land needs, accommodate forecasted growth, and avoid premature settlement area expansions or changes to employment areas. The province should consider retaining the concept and definition of “comprehensive review”. |
| Complete communities | Definition of ‘complete communities’ is proposed to be adapted from A Place to Grow with more inclusive language. No comments. |
| Conserved | No change proposed. No comments. |
| Cultural heritage landscape | Definition is proposed to be modified by deleting “Cultural heritage landscapes may be properties that have been determined to have cultural heritage value or interest under the Ontario Heritage Act, or have been included on federal and/or international registers, and/or protected through official plan, zoning by-law, or other land use planning mechanisms.” No comments. |
| Defined portions of the flooding hazard along connecting channels | No change proposed. No comments. |
| Deposits of mineral aggregate resources | Minor change. No comments. |
| Designated and available | No change proposed. No comments. |

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| Designated growth areas | Concept and definition of “designated growth areas” is proposed to be deleted. The province should reconsider the concept and definition, and the accompanying targets from A Place to Grow. |
| Designated vulnerable area | No change proposed. No comments. |
| Development | No change proposed. No comments. |
| Dynamic beach hazard | No change proposed. No comments. |
| Ecological function | No change proposed. No comments. |
| Employment area | Definition of ‘employment area’ is proposed to be modified to clarify what is included and what is excluded from employment areas. Kitchener appreciates an updated definition that clarifies what constitutes employment areas. Clarification is needed to understand how ‘lands for employment’ are defined. |
| Endangered species | No change proposed. No comments. |
| Erosion hazard | No change proposed. No comments. |
| Essential emergency services | No change proposed. No comments. |
| Fish | No change proposed. No comments. |
| Fish habitat | No change proposed. No comments. |
| Flood fringe | No change proposed. No comments. |
| Flood plain | No change proposed. No comments. |
| Flooding hazard | Minor change. No comments. |
| Floodproofing standard | Minor change. No comments. |
| Floodway | No change proposed. No comments. |
| Freight-supportive | Minor change. No comments. |
| Frequent transit | Definition of ‘frequent transit’ is proposed to be adopted from A Place to Grow. No comments. |
| Great Lakes – St. Lawrence River System | No change proposed. No comments. |
| Green infrastructure | No change proposed. No comments. |
| Ground water feature | No change proposed. No comments. |
| Habitat of endangered species and threatened species | No change proposed. No comments. |

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| Hazardous forest types for wildland fire | No change proposed. No comments. |
| Hazardous lands | No change proposed. No comments. |
| Hazardous sites | No change proposed. No comments. |
| Hazardous substances | No change proposed. No comments. |
| Heritage attributes | Definition proposed to be modified and refer to the Ontario Heritage Act definition. No comments. |
| High quality | Proposed to be deleted. No comments. |
| High order transit | Definition of 'higher order transit' is proposed to be adopted from A Place to Grow. No comments. |
| Housing options | Definition is proposed to be expanded and include additional types of housing such as laneway housing, garden suites, rooming houses, and low and mid rise apartments, and arrangement of housing such as additional needs housing, multi-generational housing, student housing, farm worker housing, culturally appropriate housing, supportive, and community and transitional housing. Affordable housing is proposed to be deleted from the definition, consistent with other changes in the proposed PPS. The province should consider retaining the affordable housing concept. |
| Hydrologic function | No change proposed. No comments. |
| Impacts of a changing climate | No change proposed. No comments. |
| Individual on-site sewage services | No change proposed. No comments. |
| Individual on-site water services | No change proposed. No comments. |
| Infrastructure | Minor change to include 'active transportation systems'. No comments |
| Institutional use | No change proposed. No comments. |
| Intensification | No change proposed. No comments. |
| Large and fast-growing municipalities | New definition is proposed which refers to Schedule 1 of the proposed PPS listing the large and fast-growing municipalities identified by the Province. No comments. |
| Large inland lakes | No change proposed. No comments. |
| Legal or technical reasons | No change proposed. No comments. |
| Low and moderate income households | Definition for "low and moderate income households" along with the concept of 'affordable housing' is proposed to be deleted. Kitchener is a strong proponent of a supply of housing along the housing continuum, which includes options for affordable |

| Proposed Provincial Planning Statement | City of Kitchener Comments |
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| | housing. Housing options must include housing that is affordable in relation to economic requirements and income levels of the community, a concept which is proposed to be withdrawn. |
| Low impact development | Definition of 'low impact development' is proposed to be adapted from A Place to Grow with minor modifications. No comments. |
| Major facilities | No change proposed. No comments. |
| Major goods movement facilities and corridors | Minor change. No comments. |
| Major transit station area | Definition and concept of 'major transit station area' is proposed to be adopted from A Place to Grow. No comments. |
| Major trip generators | Definition of 'major trip generators' is proposed to be adopted from A Place to Grow. No comments. |
| Marine facilities | No change proposed. No comments. |
| Mine hazard | No change proposed. No comments. |
| Minerals | No change proposed. No comments. |
| Mineral aggregate operation | No change proposed. No comments. |
| Mineral aggregate resources | No change proposed. No comments. |
| Mineral aggregate resource conservation | No change proposed. No comments. |
| Mineral deposits | No change proposed. No comments. |
| Mineral minimum operation | No change proposed. No comments. |
| Minimum distance separation formula | No change proposed. No comments. |
| Multimodal | Minor change. No comments. |
| Municipal sewage services | Minor change. No comments. |
| Municipal water services | Minor change. No comments. |
| Natural heritage features and areas | No change proposed. No comments. |
| Natural heritage system | No change proposed. No comments. |
| Negative impacts | No change proposed. No comments. |
| Normal farm practices | No change proposed. No comments. |
| Oil, gas and salt hazards | No change proposed. No comments. |
| On-farm diversified uses | Minor change. No comments. |

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| One hundred year flood | No change proposed. No comments. |
| One hundred year flood level | No change proposed. No comments. |
| Other water-related hazards | Minor change. No comments. |
| Partial services | No change proposed. No comments. |
| Petroleum resource operations | Minor change. No comments. |
| Petroleum resources | Minor change. No comments. |
| Planned corridors | Minor change. No comments. |
| Portable asphalt plant | No change proposed. No comments. |
| Portable concrete plant | No change proposed. No comments. |
| Prime agricultural area | Minor change. No comments. |
| Prime agricultural land | No change proposed. No comments. |
| Private communal sewage services | No change proposed. No comments. |
| Private communal water services | No change proposed. No comments. |
| Protected heritage property | Definition is proposed to be modified to include properties that are listed on the Municipal Heritage Register, designated under Part IV, V or VI of the Ontario Heritage Act, or if a property has an easement agreement with the municipality. The proposed change may diminish a municipality's ability to designate heritage resources, where they are evaluated to determine their significance and result in potential loss of cultural heritage. |
| Protection works standards | No change proposed. No comments. |
| Provincial and federal requirements | No change proposed. No comments. |
| Provincial plan | Proposed to be deleted. No comments. |
| Public service facilities | Definition is proposed to be expanded to include schools, hospitals and community recreation facilities as 'public service facilities'. No comments. |
| Quality and quantity of water | No change proposed. No comments. |
| Rail facilities | No change proposed. No comments. |
| Recreation | Proposed to be deleted. No comments. |
| Redevelopment | No change proposed. No comments. |
| Regional market area | No change proposed. No comments. |

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| Renewable energy source | No change proposed. No comments. |
| Renewable energy system | No change proposed. No comments. |
| Reserve sewage system capacity | Definition is proposed to be modified to clarify that reserve capacity applies to municipal and private communal services, and not to individual on-site services. |
| Reserve water system capacity | Definition is proposed to be modified to clarify that reserve capacity applies to municipal and private communal services, and not to individual on-site services. |
| Residence surplus to an agricultural operation | Minor change. No comments. |
| Residential intensification | Proposed to be deleted. Definition and concept of 'intensification' is retained which maintains the intent to some extent. |
| River, stream and small inland lake systems | No change proposed. No comments. |
| Rural areas | No change proposed. No comments. |
| Rural lands | No change proposed. No comments. |
| Sensitive | Minor change. No comments. |
| Sensitive land uses | No change proposed. No comments. |
| Settlement areas | Minor change with text of preamble being incorporated in the definition. No comments. |
| Sewage and water services | No change proposed. No comments. |
| Significant | Part 'a', 'b', 'c', and 'd' are proposed to be retained. Part 'e' is proposed to be deleted consistent with other changes in relation to cultural heritage and archaeology. |
| Site alteration | No change proposed. No comments. |
| Special needs | Proposed to be replaced with "additional needs housing". Kitchener is supportive of more 'inclusive' terminology. |
| Special policy area | Minor change. No comments. |
| Specialty crop area | Minor change. No comments. |
| Strategic growth areas | Definition and concept of 'strategic growth areas' is proposed to be adopted from A Place to Grow. No comments. |
| Surface water feature | Minor change. No comments. |
| Threatened species | No change proposed. No comments. |

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| Transit service integration | Definition of 'transit service integration' is proposed to be adopted from A Place to Grow. No comments. |
| Transit supportive | Minor change. No comments. |
| Transportation demand management | No change proposed. No comments. |
| Transportation system | No change proposed. No comments. |
| Two zone concept | No change proposed. No comments. |
| Valleylands | No change proposed. No comments. |
| Urban growth centres | New proposed definition in relation to the concept of 'urban growth centres' from A Place to Grow. The definition mentions that "it is anticipated that no new urban growth centres will be identified", making the concept of urban growth centres to be a legacy concept which may eventually fade away with the accompanying proposed policy that enables change in the size or location of urban growth centres. |
| Vulnerable | No change proposed. No comments. |
| Waste management system | No change proposed. No comments. |
| Watershed | No change proposed. No comments. |
| Watershed planning | New proposed definition adapted from A Place to Grow. Definition in A Place to Grow contains more clarity in relation to what constitutes watershed planning. The province should consider the aspects of watershed planning that could be included from A Place to Grow to provide a more comprehensive description. |
| Water resource systems | New proposed definition adapted from A Place to Grow in relation to watershed planning. No comments. |
| Wave effects | Expansion of the definition clarifying what includes wave effects. |
| Wayside pits and quarries | No change proposed. No comments. |
| Wetlands | No change proposed. No comments. |
| Wildland fire assessment and mitigation standards | No change proposed. No comments. |
| Wildlife habitat | No change proposed. No comments. |
| Woodlands | No change proposed. No comments. |